

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Elliot M. Hirsch,

Plaintiff,

Civil Action No. 21-12246 (FLW)

v.

**Proposed Amended Complaint
and demand for jury trial**

Adina Miles, Laurie Beda, Norma Tawil, Heshy Tischler,

Amber Adler, Yeshiva of Flatbush Joel Braverman High School, Elisheva Yarimi, Nourite Maimon, Eve Scaba, Sarah Mizrahi, Yafah Sutton, and Lauren Dagmy.

Defendants

INTRODUCTION

1. Plaintiff Pro Se, Elliot M. Hirsch, brings this action against Adina Miles, Laurie Beda, Norma Tawil, Heshy Tischler, Amber Adler, Yeshiva of Flatbush Joel Braverman High School, Elisheva Yarimi, Nourite Maimon, and Eve Scaba for their intentional malicious harassment and defamatory campaign against me. The allegations herein of Plaintiff are based upon personal knowledge and belief as to his own acts and upon information and belief as to all other matters.

2. The reason the above-named individuals and entities engaged in these malicious/criminal acts was in order to severely oppress, harass and intimidate me so that I grant my wife, Elizabeth M. Kairey, a Jewish divorce, otherwise known in Hebrew as a Get.

3. A Get is a piece of paper that must be physically deposited into the hands of a married Jewish woman in order for her to be considered legally divorced according to Jewish Law.¹

4. Articles posted on the internet define a Jewish woman who is “chained” to a dead marriage as an “Agunah”.²

5. The term Agunah, which is Hebrew and loosely translated into English as “chained”, is currently interpreted by the Orthodox Jewish communities as referring to a woman who demands a GET from her husband and does not receive one.

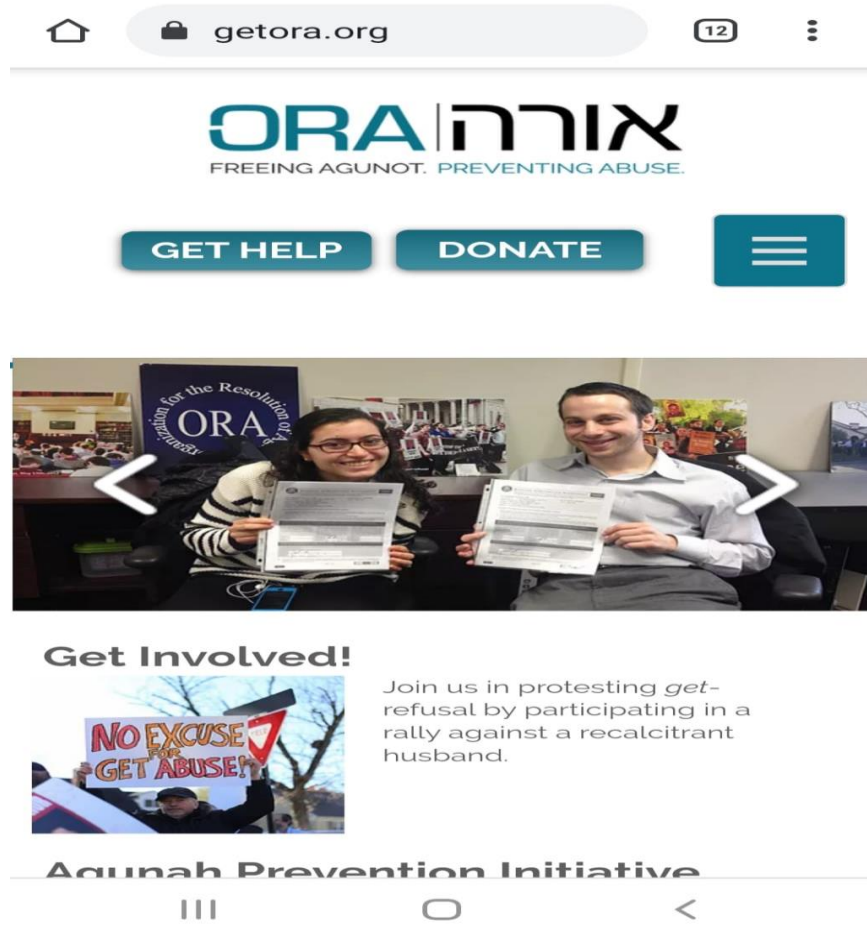
6. The term Agunah and “get refuser”, as reported by world renowned Vogue magazine, is associated with Jewish Orthodox men who commit “abuse”.³ Additionally, said magazine article provides me with irrefutable evidence that these Defendants engaged in the acts I am accusing them of.

¹ <https://www.womenslaw.org/laws/religious/jewish-get-law-divorce-law/basic-info-about-jewish-divorce-law/what-get-or-sefer>

² <https://www.womenslaw.org/laws/religious/jewish-get-law-divorce-law/basic-info-about-jewish-divorce-law/what-agunah>

³ <https://www.vogue.com/article/agunah-get-refusal-social-media-campaign-orthodox-women>

7. There is an organization that has been around for over 20 years called “ORA”, which focuses on helping women receive a Get from their husband. Their webpage cover page



is:

8. Ora organizes rallies against men whom they determine are “get refusers” and many prior rallies they have organized are posted on various forms of social media. I have never seen an Ora rally where protestors were threatening violence, honking car horns, or throwing eggs and dumping animal feces on “get refusers” property. Additionally, I have never seen an Ora rally that took place on a residential street after business day work hours. Moreover, Ora does not engage in any rally against a “get refuser” unless they first receive a document signed

by a Beth Din, Hebrew term for Rabbinic Court, authorizing them to engage in public shaming of the “get refuser”.⁴

9. Pointedly, Ora had absolutely zero involvement in my divorce controversy and was not at all associated with the acts the Defendants committed.

10. These above-mentioned Defendants publicly accused me of being a “get refuser” and conspired to oppress, threaten, and intimidate me in the free exercise or enjoyment of my right of freedom of religion secured to me by the Constitution of the United States by **expressly stating** that they were engaging in harassment and public shaming in order that I grant my wife a Get.

11. My personal address and phone number was shared to social media to tens of thousands of people for the express purpose of sending rioters to come harass me at my personal home in addition to bombarding my personal cell phone with threats of violence and harassment.

12. Indeed, two separate riots were specifically organized and directed against me with one occurring at my personal residence in Oakhurst, NJ on March 10, 2021, and the other in Brooklyn, NY, on March 11, 2021, near my father’s medical office.

13. At the Brooklyn protest, the Defendants tried to come block the entrance to my father’s medical practice, where his patients, who are primarily senior citizens, would have extreme difficulty entering the premises if not being completely precluded from being able to come in to the office.

⁴ <https://www.getora.org/faqs>

14. The rioters tried coming down the block to my father's office but were quelled by Heshy Tischler and Rabbi David Ozeri who successfully prevented the rioters from coming down the block to my father's office by promising them that a GET was forthcoming that same day.

15. One of the mob leaders, while standing amongst other rioters supporting her, explicitly threatened to bring the mob to my father's office, my personal residence, and my parent's home, if a Get was not given that day March 11, 2021.

16. Videos of the illegal riot outside my home and the protest in Brooklyn, NY were circulated on social media to thousands of people.

17. The main forum where the Defendants conspired was on Instagram, an app that is one of the most widely used forums of social media in the world.

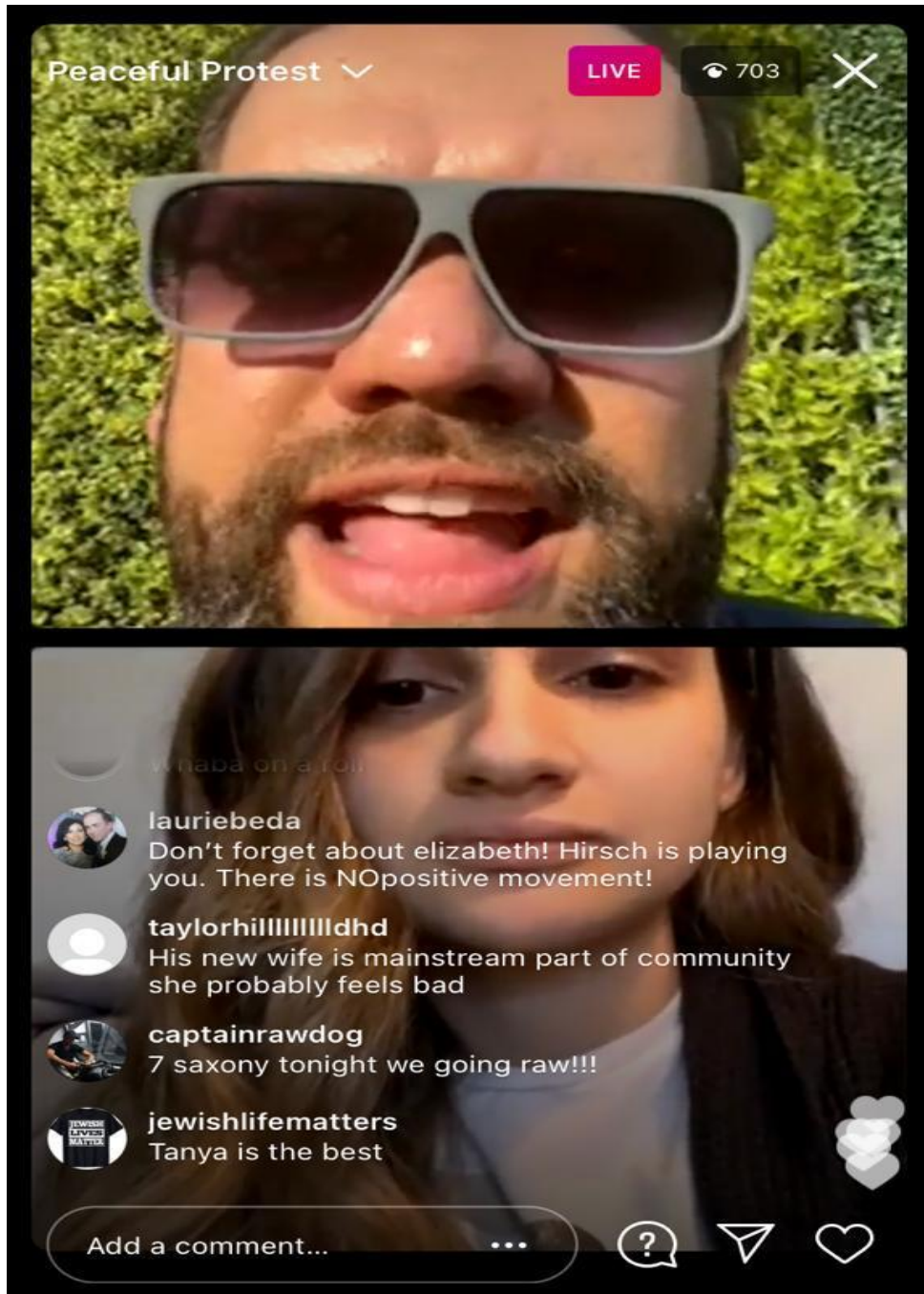
18. The main Instagram account where I have accumulated most if not all of the evidence for this complaint is called "mexicanpacino0528".

19. The owner of this account is a person named Abraham Manopla who lives in Oakhurst, NJ and is a member of the Syrian Jewish Community. Mr. Manopla gained much fame due to his involvement in this agunah movement.⁵

20. Mr. Manopla, who calls himself "the Mexican pacino", entertained thousands of followers on his Instagram account during the week of March 8 through March 11, 2021, updating them regarding my Jewish divorce controversy with my wife.

⁵ See <https://www.heyalma.com/the-agunah-crisis-explained/>, <https://vinnews.com/2021/03/21/tonight-rally-planned-to-freenechama-from-get-refuser-dovid-wasserman/>, see <https://imageusa.com/free-from-chains-a-glimpse-into-the-aguna-get-crisis/>

21. Instagram has a feature where an account holder can commence what is called a “live” and it is basically a live streaming video where the account holder enters a title to the video, which is placed on the top of the screen, while speaking to his viewers. On the “live” the account holder can invite guests onto the live and the screen splits and has both screens available to view each person during this live video session as seen here:



22. Mr. Manopla had dozens of guests on his lives throughout the week of March 8-March 11 and continued to do so for several months after I gave my wife a GET on March 11, 2021.

23. Mr. Manopla, claimed to be only a reporter, and would have guests come onto his live videos sharing information regarding updates as to whether or not I had given my wife a



GET as seen here:

24. The guests came onto Manopla's show and advised him and the thousands of viewers who were watching the live as to whether or not I had given a GET and if so, where proceedings were holding.

25. During the week of March 8- 11, 2021 I was not the only person who was the subject of these mob riots.

26. A man by the name of Dibo Hafif had several massive mob riots outside of his home in Brooklyn, NY in the borough of 61st precinct of the NYPD.

27. Mr. Manopla had guests come on the show while they were at the riots and showed live video streaming of the mob protests. On March 10, 2021, there were simultaneous riots taking place, one at Dibo's home located at 2136 East 5th Street, Brooklyn, NY 11223 and one at my home 7 Saxony Drive, Oakhurst, NJ 07755.

28. Some of the above-mentioned Defendants were present at the riots at Dibo's house and explicitly stated they were coming to the protests for my wife the following day and indeed, some of those same mob leaders appeared at the protest directed at me.

29. The Defendants will likely deem Mr. Manopla the face of this mob riot movement, however, he was not the organizer nor the creator of the harassment and defamation that occurred to me. Mr. Manopla did not create nor organize the protests against me. His part would likely be classified as more of an instigator and inciter and simply giving the Defendants a forum to spew harassment and threats towards me. But based upon said argument, Instagram could bear responsibility for providing the Defendants a forum to engage in harassment and defamation.

30. Manopla, in large part, played the role of reporter and would relay to his thousands of followers, *inter alia*, where the protests and riots were taking place. Interestingly, Mr. Manopla was in Mexico City the entire week of March 8- March 11, 2021.

31. Many of the above-mentioned Defendants made explicit threats to me and my family on Manopla's live videos in addition to the threats made at the protests.

32. Mr. Manopla proclaimed himself and these Defendants to be members of the "Sephardic brotherhood". And that "nobody messes with the Sephardic brotherhood".

33. In Brooklyn, New York, on March 11, 2021, at approximately 8:15pm, I gave my wife a GET.

34. Several weeks after the GET was given, members of this mob realized that they in fact, were a mob.

35. Manopla had another live where a man named Saul Harari appeared as a guest and told Manopla he was "out of the mob".

36. Harari told Manopla, "who gave us the right to harass Elliot Hirsch". Harari also stated, " who gave us the right to harass Elliot Hirsch's father".⁶

37. On one of the live videos on March 10, 2021, that Manopla commenced, he expressly stated that he was not sure the mob mentality was a good approach.

38. Manopla publicly stated that he was worried about potential lawsuits because of the mob riots and public harassment that was occurring to me and Dibo Hafif.

⁶ See <https://www.youtube.com/watch?v=DeQ3uiWS1LA>

39. Manopla confirmed(although confirmation was unnecessary since videos were circulated all over social media showing the riots) that dog feces was placed on Dibo Hafif's home and the crowd threw dozens of eggs at the house of Dibo Hafif. Additionally, Manopla stated that people were throwing rocks at Dibo's house. Manopla told his crowd that the Syrian Jewish community is not Antifa or Black Lives Matter and that they cannot engage in illegal activity that would bring shame to their community(although it was too late as the mob already did so).

40. The riot outside my home in Oakhurst had, according to Manopla, "hundreds of people".

41. I was not home during the riot as I knew a mob of protestors were headed my way since I received dozens of text messages advising me to leave town before I get a beating. Dozens of friends of mine shared with me the Instagram videos where the Defendants and others advertised the riot outside my home. I was in the police station in fear for my life and the numerous officers who were with me that night could testify as to my mental state that evening. The Judge granted me a temporary order of protection against my wife at around 12:30am.

42. The next night, March 11, 2021, at approximately 6pm, my brother, Judah Hirsch, who was home at my parent's home in Brooklyn, NY went outside to talk to the police. The 61st Precinct sent one police car to show a presence at a potential mob riot that was planned to take place at 9pm outside my dad's Brooklyn residence unless I gave my wife a GET.

43. The police told my brother that they would **not** stop the mob rioters from throwing eggs at our home.

44. After I gave the Get I went back to my parents Brooklyn residence as I was quite fearful to be all alone in my home in Oakhurst. Additionally, I, quite often, sleep in my father's Brooklyn residence(my Oakhurst residence is my father's home as well) since my parenting time primarily takes place in New York as my daughter lives in Brooklyn.

45. When I arrived at my parents Brooklyn, NY home that night, March 11, 2021, I approached the police car that was parked across the street from my parent's residence. I advised the officers that my name was Elliot Hirsch and that I gave my wife a GET. They thanked me profusely and I actually took a video of this incident for my records which I can provide to this Court at trial.

46. The NYPD had only one police car present at the Dibo Hafif riots, and they only sent one police car to my parents' home to protect us from the mob. This mob consisted of 500-1000 people, and this is not an exaggeration. There are numerous videos posted all over social media showing this mob and the throwing of eggs at Dibo's home and the NYPD doing absolutely nothing to cordon off the home or protect the owner's property. In New Jersey, the Ocean Township operated quite differently. The Ocean Township Police issued motor vehicle summonses and brought 10 officers to disperse the illegal protest outside my home. Additionally, one of the officer's present at the protest spoke to Manopla on one of the live videos of the protest and the officer told Manopla, "this is not peaceful. When they are yelling and honking the horn, this is not called peaceful. Leave him alone and leave the area. This has nothing to do with you guys."

47. According to Orthodox Jewish law, for a *GET* to be valid a husband must grant it to his wife of his own free will. Only under very limited circumstances may a Jewish Rabbinic Court engage in coercive methods so that a man gives his wife a *GET*. Otherwise, a GET given

due to coercion will be deemed invalid.⁷ It is submitted that in my particular case, multiple *Beth Din*'s, the Hebrew term for Rabbinic Court, issued written statements that it was forbidden to pressure me to give my wife a GET. According to several expert Rabbis in the field of Orthodox Jewish Divorce law, I gave my wife what is called a *GET MEUSEH*, the Hebrew term for “forced get”. And said GET was rendered null and void by said Rabbis.

48. Because of the aforementioned Defendants, especially Adina Miles, the divorce controversy of Elizabeth Kairey and I became a widely publicized case in the Orthodox Jewish circles, and it was eventually reported on several Jewish News sites.⁸

49. I expressly told the Beth Din at the GET proceeding that I required a video to be made by Harry Adjmi and Rabbi David Ozeri, two very influential public figures in the Syrian Jewish Community of Brooklyn, Ny and Deal, NJ, to inform the public to cease all harassment towards me and my family.

50. The video was immediately published after I gave my wife a GET and I had no more threats of mob riots outside my home and the home of my parents.

51. Over the next couple of weeks, the mob violently harassed several other “get deniers” or “get refusers” as they call us, via death threat texts, illegal protests, and harassment at the JFK International Airport. There are hundreds, if not thousands, of potential witnesses I could bring to trial to verify the harassment that I personally suffered at the hands of the aforementioned Defendants.

⁷ See <https://www.jlaw.com/Articles/getart3.html>, The New York State Get Bill and its Halachic Ramifications Rabbi Chaim Malinowit

⁸ See <https://vinnews.com/2021/03/11/elizabeth-is-free-flatbush-agunah-receives-get-as-momentum-builds-to-support-trapped-women/>

52. In summary, the Defendants committed criminal acts and civil torts under the facade of Orthodox Jewish religious activism. This is the main reason they were able to gain the popularity of the masses and incite such violent hatred and disorderly conduct towards me and my family; namely, they created the impression that they were acting in the name of justice. However, the acts perpetrated against me were nothing short of illegal, both criminally and civilly and both according to State and Jewish law.

53. In the forthcoming complaint it will be described in extreme detail the specific acts committed by each and every Defendant.

54. From what I have heard via word of mouth, these Defendants are not the only individuals who were involved with organizing the harassment towards me, however, the undersigned does not have evidentiary support to buttress those allegations rather it has simply been relayed to me and that is why I have only named individuals for whom I retain strong evidence for.

55. I ask this Court to punish the Defendants with great severity as their actions were wanton, malicious, and caused me permanent reputation and emotional damage and cannot be countenanced in a civilized society in this Country.

JURISDICTION AND VENUE

56. Plaintiff brings this suit pursuant to 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, which is a diversity jurisdiction case. Plaintiff also brings this suit pursuant to 42 U.S. Code § 1985. Conspiracy to interfere with civil rights which is a federal law claim 28 U.S. Code § 1331.

57. Venue is proper pursuant to 28 U.S.C. § 1391(b)(2).

PARTIES

58. Plaintiff, Elliot M. Hirsch, resides at 7 Saxony Drive, Oakhurst, New Jersey 07755. Plaintiff's telephone number is 917 750 0418 and email address is Elliothirschlaw@gmail.com.

59. Defendant Laurie Beda permanently resides at 441 Quentin Road, Brooklyn, NY 11223, Defendant Norma Tawil resides at 2039 East 8th street, Brooklyn, NY 11223. Defendant Amber Adler permanently resides at 1775 east 13th street Apt# 5F, Brooklyn, New York 11229. Defendant, Heshy Tischler's business address is 5318 16th ave, Brooklyn, New York, 11204. Defendant Elisheva Yarimi resides at 1452 E 12th St, Brooklyn NY 11230. Defendant Yeshiva of Flatbush Joel Braverman High School is located at 1609 Ave J, Brooklyn, New York 11230. Defendant Adina Miles resides at 1416 E 16th St, Brooklyn, NY 11230-6608. Defendant, Eve Scaba resides and/or has a place of business at 1966 East 21st street, Brooklyn, New York 11229. Defendant Nourite Maimon resides at 14 Manhattan Court, Brooklyn, New York 11223. Defendant Lauren Dagmy resides at 1745 East 7th street, Brooklyn, NY 11223. Defendant Sarah Mizrachi resides at 1653 Ocean Parkway, Brooklyn, NY 11223. Defendant Yafah Sutton resides at 1953 East 24th Street, Brooklyn, NY 11229.

STATEMENT OF CLAIM

60. The incidents that give rise to this action took place on WhatsApp, and Instagram on March 8, 9, 10, and 11 in the year 2021 and in Brooklyn, NY, on the corner of Ave P and Kings Highway at Ocean Ave, adjacent to a park named "Corporal Wiltshire Park" on March 11, 2021, at circa 12:00pm and at 7 Saxony Drive, Oakhurst, NJ 07755 on March 10, 2021. I was not

present at either protest as I was in hiding, however, the threatening messages that were made at the illegal protest and on Instagram were sent to me via electronic means; namely, Instagram and WhatsApp, while I was present in the State of New Jersey. Accordingly, a substantial part of the events giving rise to this claim occurred in this Court's jurisdiction. Additionally, many of the defamatory comments made about me still exist on the internet to this date.

FACTS

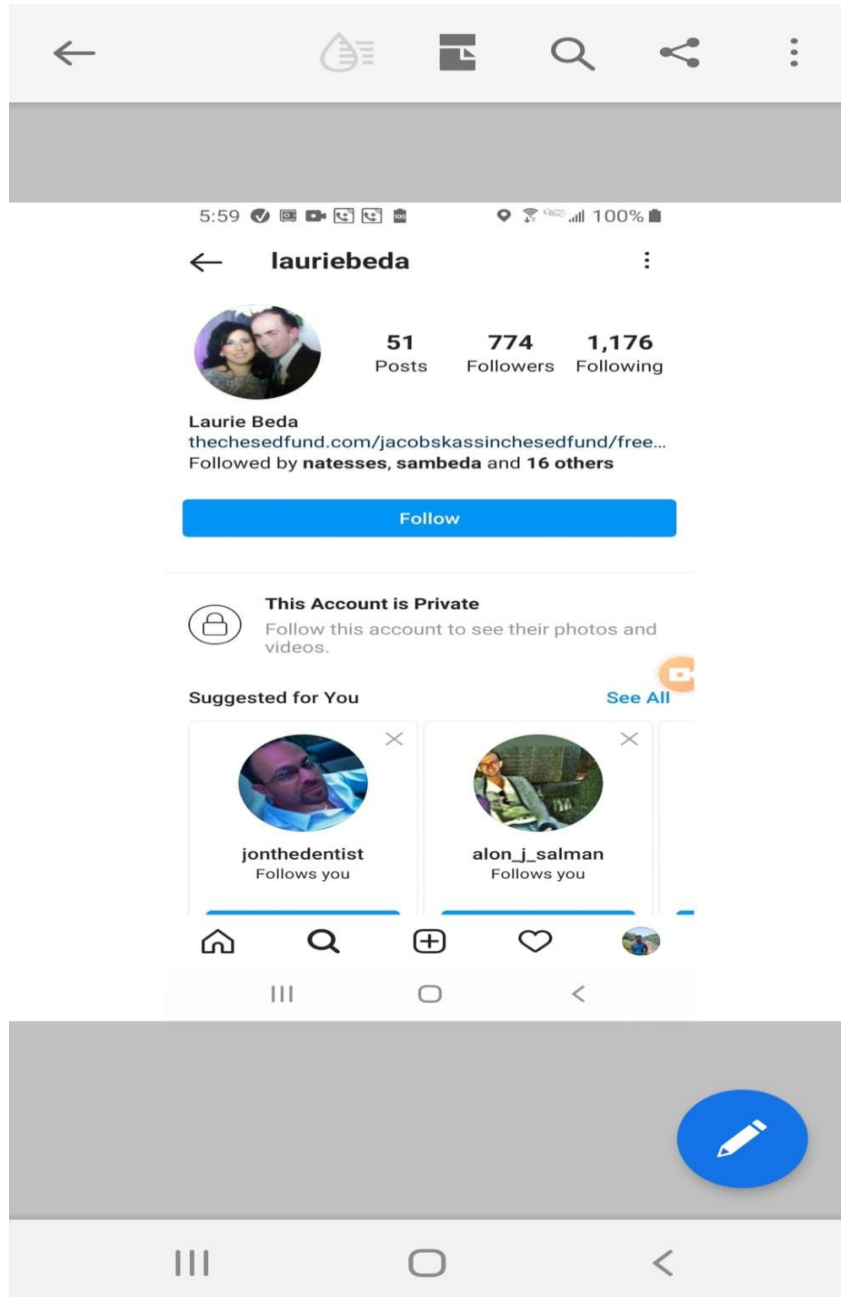
I. DEFENDANT LAURIE BEDA

61. Laurie Beda is the sister of Elizabeth Kairey's mother, which makes her my wife's aunt. Laurie Beda had and still retains an Instagram account under the name "lauriebeda". Her picture, her standing next to her husband Leon Beda, is there as the icon photo.

62. Laurie Beda has(and still has) a picture of her and her husband, Leon Beda, as her icon photo.

63. As of the time of the first complaint filed here in this Court, Laurie Beda still had posted on her Instagram page a link to a website called "the chesed fund". The exact link she

posted was <https://thechesedfund.com/jacobskassinchesedfund/freeelizabeth> see here:



64. The webpage that Laurie Beda posted on Instagram page was a “charity” campaign for my wife Elizabeth Kairey. Said webpage was rendered defunct after my wife was able enrich herself, by virtue of its contents being publicized by many individuals, including but not limited to Laurie Beda, with approximately \$128,000 in less than 48 hours.

65. On the webpage a picture was posted of my wife Elizabeth Kairey adjacent to our daughter, whose face was blotted out(I found that offensive). Obviously, the purpose of the picture posted was to draw public sympathy for Elizabeth as she is single mother by choice as I did not file for divorce and in fact offered to stay married and support Elizabeth Kairey and our daughter. I used to be a teacher for children with special needs before I decided to pursue a law degree.

66. Said webpage was published on March 8, 2021, on the Chesed Fund organization webpage and created by a Jewish Synagogue called Edmond J. Safra Synagogue located in Brooklyn, NY. My wife and her family are members of said synagogue.

67. On said webpage my name was stated throughout the comments section posted on the webpage and referenced me as “he” throughout the description on the webpage. It is indisputable that I was the subject of the description on the webpage.

68. The way the Chesed Fund website works is that the comments section is completely controlled by the person/organization that created this website. So, if a person posts a comment(they must donate at least \$1 in order to comment), the webpage creator can either leave the comment or delete it.

69. Accordingly, the webpage creator and those that published its content, such as Laurie Beda, should be held accountable for all comments that were made and left on the website.

70. Several comments posted on said webpage contained threats of violence directed at me and inciting hatred towards me and my family.

71. Thereafter the webpage creator posted a disclaimer to its viewers to not post negative comments and deleted all the threatening posts but only after most of the money was collected and the damage to my reputation was done as seen below:



\$128,353.29

donated by 1066 people

Goal: \$150,000

Donate

Share Campaign

THANK YOU EVERYBODY FOR YOUR AMAZING SUPPORT!

We've raised a significant amount of money for Elizabeth and she is officially free!! Baruch Hashem!

THIS CAMPAIGN IS ENDORSED BY:

RABBI ELI MANSOUR- Head Rabbi of Edmond J. Safra Synagogue in Brooklyn, NY

RABBI HAROLD SUTTON- Rosh HaYeshivah of the Sephardic Rabbinical College, Magen David Yeshivah and Yeshivat Moreshet Yerushalayim, in Israel.

<https://thechesedfund.com/jacobkassinchesedfund/freelizabeth>
2/4

3/13/2021
Elizabeth is Free | The Chesed Fund

RABBI TIDHAR COHEN- Beit Horaah 'Emet Vasedek', Brooklyn, NY

RABBI MAX SUTTON Rosh Beit Din Aram Soba Jerusalem, Israel

All donations are tax deductible.

PLEASE DO NOT POST ANY NEGATIVE COMMENTS

HELP FREE ELIZABETH! A young woman in our community who has been refused a GET for almost 4 years and needs her life back!

She has accumulated lawyer's fees surrounding the case and has a 4 year old child to support on her own.

She has been refused child support and her freedom, despite the direction of the Beit Din.

She needs our help with living expenses, lawyer fees, tuition for her child, summer camp and clothing for her child.

She works as a teacher in a community school.

Her family gives her all they could, but unfortunately it is not enough to cover her debts, especially given the mounting lawyer fees.

REFUSING A GET IS ABUSE AND IT NEEDS TO STOP!

We need to help her stay strong and help alleviate this financial burden!

Any amount will help. Please pray for her freedom (Chaviva Mazal bat Chava).

#FREEELIZABETH

Created By


TAX
DEDUCTIBLE

<https://thechesedfund.com/jacobkassinchesedfund/freelizabeth>
3/4

3/13/2021
Elizabeth is Free | The Chesed Fund

The Edmond J. Safra Synagogue Inc C/O Jacob S. Kassin Hessed Fund

The Edmond J. Safra Synagogue Inc C/O Jacob S. Kassin Hessed Fund
1801 Ocean Parkway
Brooklyn, NY
Tax ID: 205569592

Contact Organizer
communityagunahfund@gmail.com

Recent Donations

Anonymous Donor
1 day ago

Much hatzlaha to this wonderful family. May hashem repay them thousand fold and may Elizabeth begin a new future with this great FREEDOM.

Abraham Shiloach



effected

\$

\$2,601

72. Thereafter, the website creator disabled the feature of people being allowed to comment, which they likely should have instituted at the outset of the campaign.

73. Once the website campaign reached circa \$128,000 they shut down the ability to donate. Soon thereafter, the website was rendered defunct.

74. The website stated, *inter alia*, that I never paid any child support.

75. The website also stated that I appealed every decision of the civil court(referencing the divorce action between Elizabeth Kairey and Elliot Hirsch index number 53206/2018 in Supreme Court Kings County).

76. Comments were made on this website stating, “let’s make a physical gathering and get the get”. Another comment posted stated “ wow, let’s do that, good idea, he’ll regret every day he held her back, Where do we go? He’ll get scared and give it(the GET) immediately.”, which supports the notion that the people involved with this harassment campaign knew that I would not be able to withstand the intense humiliation and intimidation.

77. Another comment posted stated “elliot you are evil”. Another comment stated, “boycott Dr. Jonathan Hirsch”.

78. Over 1000 people donated to this webpage.

79. To emphasize the spuriousness of the comments section on this website, there was a donation in the name of Stuart Husney and Elliot Hersch(spelling my name wrong). I can testify under oath that I did not donate to this campaign and Stuart Husney, who is my mother’s brother, also did not donate to this campaign webpage. Accordingly, there were people obviously

falsely stating names of donators in order to further their objective that even my family members were opposed to me and did not support me in my refusal to give my wife a GET.

80. There were comments posted by people that were truthful as one post was made by my former best friend's sister Vicky Mizrahi stating that it was my former best friend's wish that I give my wife a GET. My former best friend, Elliot J. Dabah, died November 2020 from a drug overdose and he did in fact send me messages about 6 months prior to his death advising me to give my wife a GET.

81. My wife's attorney Jay R. Buttermann has recently confirmed that his client received the money and approved the webpage. Accordingly, there is no doubt that this webpage was created to, *inter alia*, fund my wife's litigation expenses in her current lawsuit against me in Supreme Court Kings County and that I was the subject of the defamation and threatening comments.

82. Besides for Laurie Beda's publishing the aforementioned webpage which contained much defamation and threats of violence directed specifically at me, on March 10, 2021, Laurie Beda, further engaged in a deliberate malicious campaign of harassment and intimidation via Instagram posts she made on her main page and on one of Manopla's live Instagram videos.

83. Said posts galvanized a mob of illegal protestors to come riot and protest outside my home at 7 Saxony Drive Oakhurst, NJ 07755 on March 10, 2021, and my father's medical practice on March 11, 2021, located at 2136 Ocean Ave, Brooklyn, NY 11229.

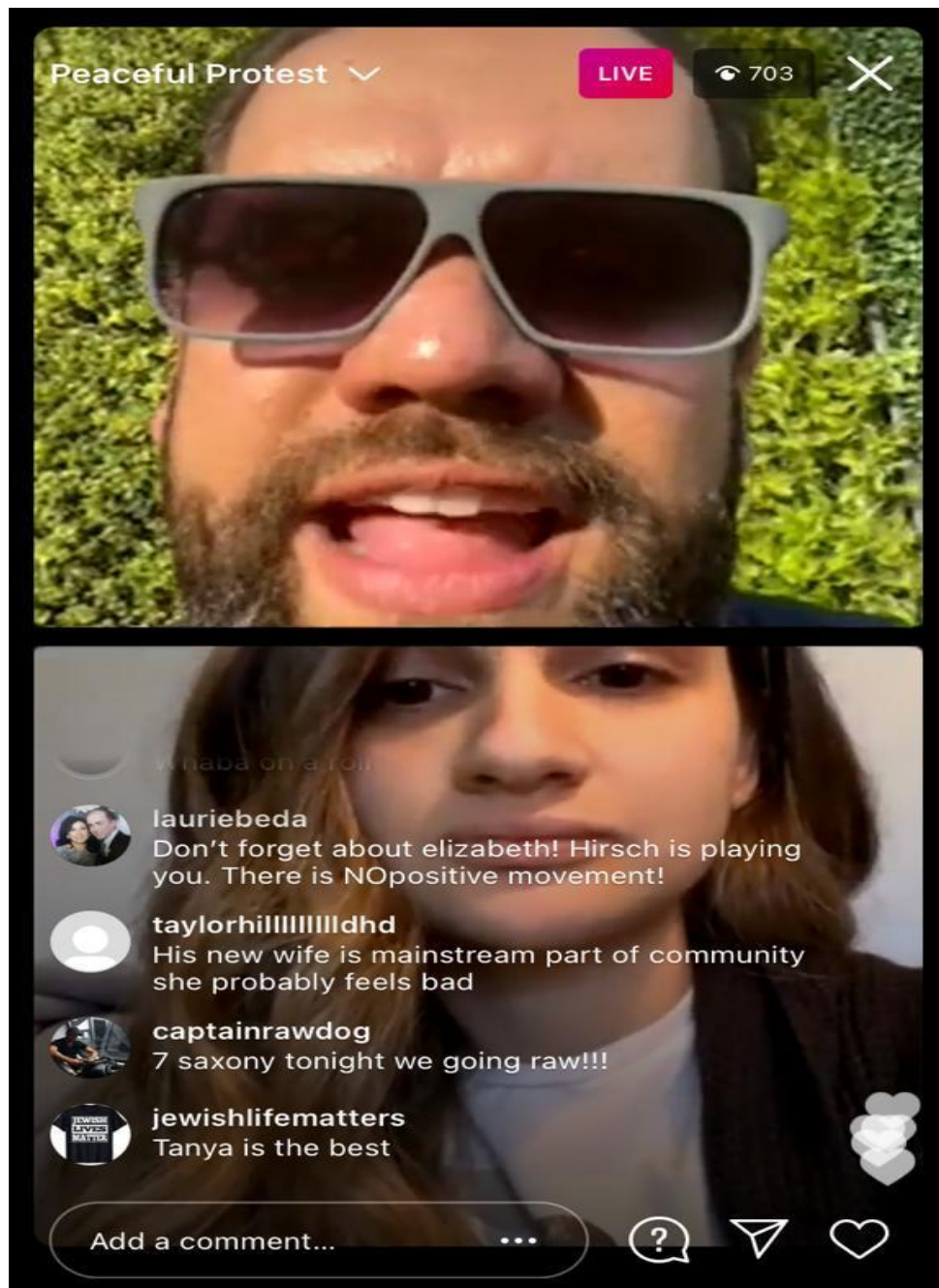
84. On March 10, 2021, during an Instagram live video Manopla commenced, which he labeled “peaceful protest”, Laurie Beda, made numerous posts/comments on this live video, which had approximately 800 people viewing it.

85. There is no doubt that Laurie Beda is the person who made the comments on the live video entitled “peaceful protest” as I have irrefutable evidence of videos that were posted publicly at the Brooklyn protest where Laurie publicly stated many truthful details about my divorce controversy with my wife. Additionally, Laurie even came as one of my wife’s representatives to an arbitration proceeding back in April 2018. And lastly, the icon photo of Laurie Beda, with her picture, cements her as the one who made the comments.

86. Laurie Beda made the following comments on this live video titled “peaceful protest”(the protest was deemed NOT peaceful by the Ocean Township Police Dep.)

- A Don’t forget Elizabeth! Hirsch is playing you. There is no positive movement.
- B. Blast this to hirsch.
- C. I am credible.

as seen here below :

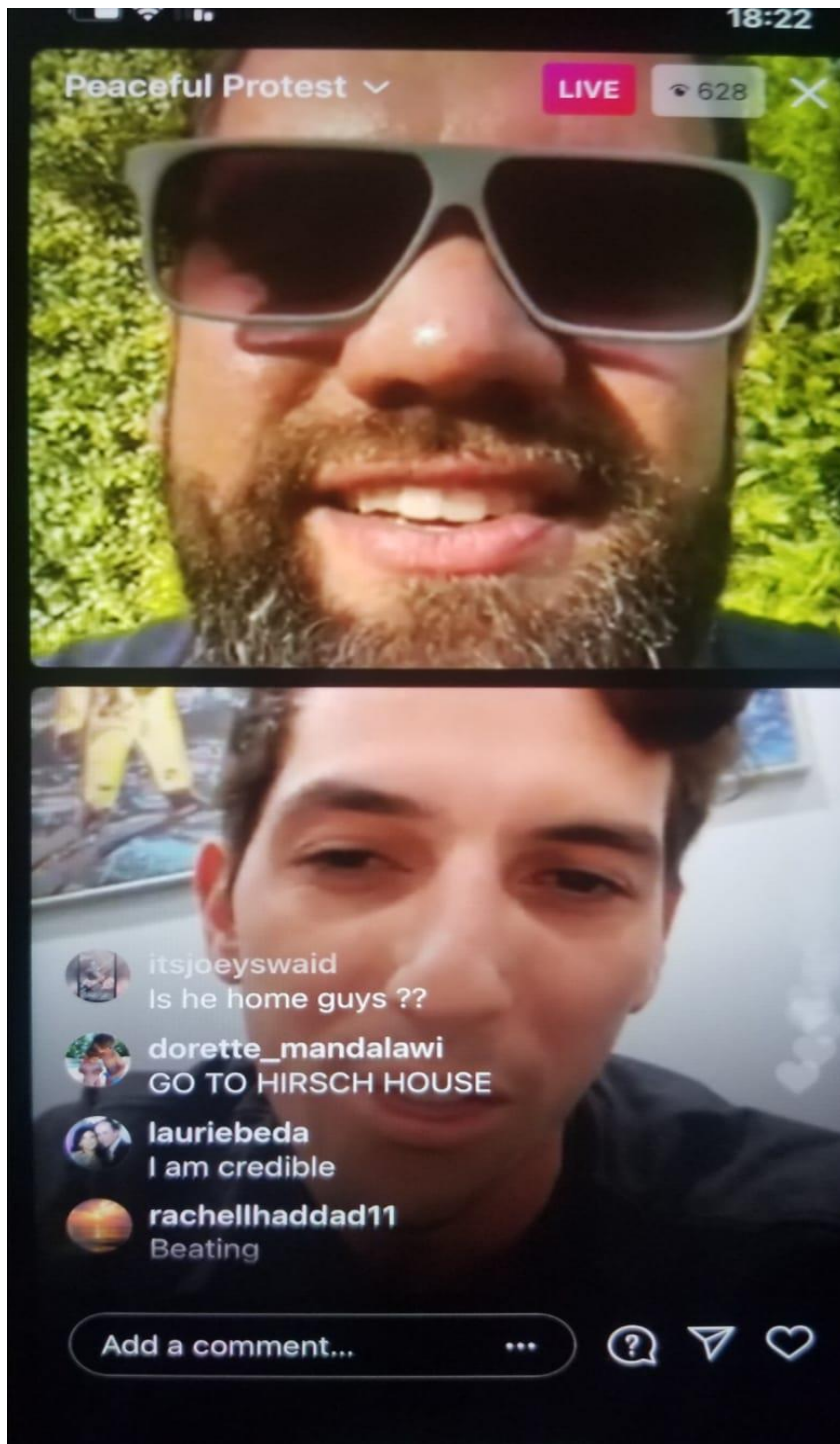


87. Here are some of the other comments people made on the live video that give Laurie Beda's comments more context:

- A. Laurie Beda is credible. She says no movement.

- B. Is he home guys?
- C. Beating
- D. Go to Hirsch house.
- E. Wherever he is. We got peeps.
- F. Yes share his number. Let's raise Hell.
- G. Lets go 7 Saxony Dr. tonight.
- H. There is no movement.
- I. Well boat his phone
- J. Yes share his number. Let's raise hell.
- K. 7 Saxony tonight. We going raw

as seen here below:

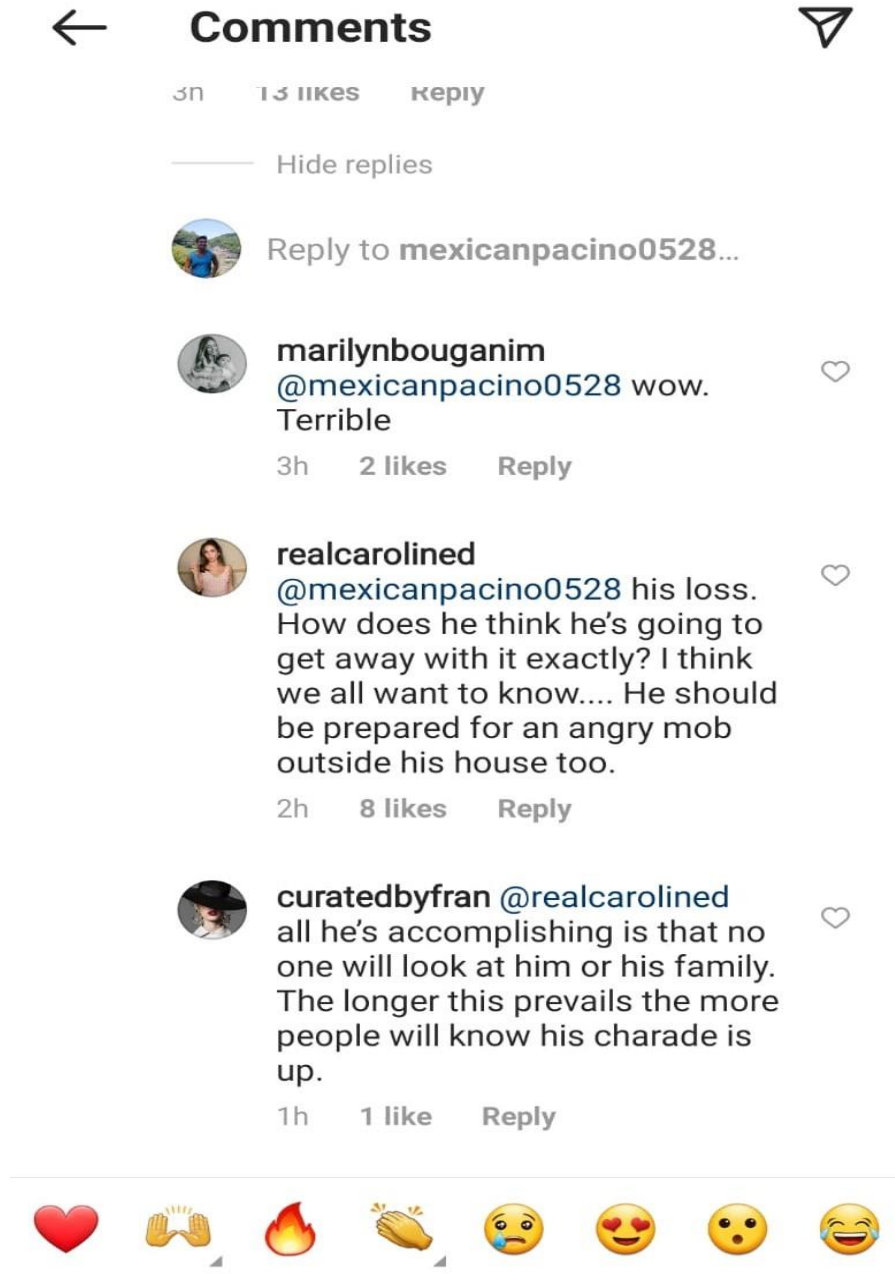


88. I was able to download most of the live video that was titled "peaceful protest". However, the comments people make during the live video do not get saved on Instagram. But I received screenshots of the above-mentioned comments from people who sent me them via

WhatsApp. The people sent me these screenshots because Laurie Beda advised the crowd to “blast this to hirsch”. And indeed, I received the threatening messages from numerous people. And this is how I knew to go to the police station before the rioters showed up at my house.

89. Due to Laurie Beda’s public statement stating, “blast this to hirsch”, I received notice about this video and the planned protest at my home 7 Saxony Drive Oakhurst, NJ 07755. My personal address and phone number was shared to over 1000 people. Additionally, because of Laurie Beda, I received dozens of texts advising me to leave town because I was going to get a beating as shown in the picture above. I had numerous random numbers harassing me to give my wife a GET because of Laurie Beda’s comment, “there is no movement” and “blast this to hirsch”.

90. Because Laurie Beda said to “blast this to hirsch” I had received hundreds of phone calls and texts from random strangers advising me of this planned protest and that I should be prepared for a physical beating from a mob of protestors. I also received messages on Instagram which were posted publicly advising me “he should be prepared for an angry mob outside his house too”. These posts just certify that the people knew they were a mob as seen here:



91. Extremely important to note is that during this live video Mr. Manopla was reading the comments and telling the viewers to **NOT** go to my home at 7 Saxony Drive. He repeatedly asked the mob to not to go to my home because someone informed him that there were positive developments in the case.

92. However, during the video which I can provide to this Court, it is evident that Manopla was continuously reading the comments posted by Laurie and others that were explicitly advising the crowd to mob my home that night. (all viewers are able to see the comments posted during the live).

93. Laurie Beda's actions culminated in an illegal riot outside my home at approximately 930pm on March 10, 2021.

94. A police report was filed with the Ocean Township Police Department. As stated in the police report #21OT04466, 10 Police officers were needed to disperse the illegal protest. As stated in the report, the officers heard the crowd chanting "give her a get" and my name and Elizabeth's name being yelled.

95. The officers observed numerous vehicles blocking the roadway and cars blowing their horns, causing a civil disturbance, waking up the block and obstructing the flow of traffic.

96. The officers heard the crowd chanting the names "Elliot and Elizabeth".

97. There was a field reporter, named Michael Sabon Salomon, who was conversing with Manopla on a live while the riot/protest was taking place.

98. Mr. Salomon informed Mr. Manopla that people were "smashing cars" and "demanding" that I give my wife a *GET* and trying to break my doors down.

99. Before the people arrived at my home I fled to the Ocean Township Police Dep. for my safety. I was at the police station for approximately 3 hours. Once the officers were able to disperse the protestors one of the responding officers came back to the precinct and spoke with me. I advised him I wanted to apply for an order of protection against my wife.

100. I got on the phone with a Judge and the Judge granted me a temporary order of protection against my wife. I explained to the Judge how the protestors were there to give me a beating and force me to give my wife a *GET*. The Judge understood the situation and actually advised me to give my wife a GET. I understood his position because there was no stopping the mob from coming to my home every single night.

101. The police offered me a safe house to sleep in that night, which I declined. I called several friends of mine asking them if I can sleep by them, but they were all afraid that the mob would find out where I was staying and would come to their homes. In fact, at around 2pm on March 10, 2021, I called a friend of mine who has a home near Albany, NY and asked him if I could sleep by him March 10, 2021.

102. This friend's name is Shmuel Hiller.

103. Shmuel advised me that there was no issue at all, and I could stay at his home and to call him at around 7pm that night for directions to his house.

104. When I called Shmuel later, he ignored my call. I called him 10 times and he ignored all 10 calls.

105. 2 months later I called Shmuel and asked him why he ignored me on March 10, 2021.

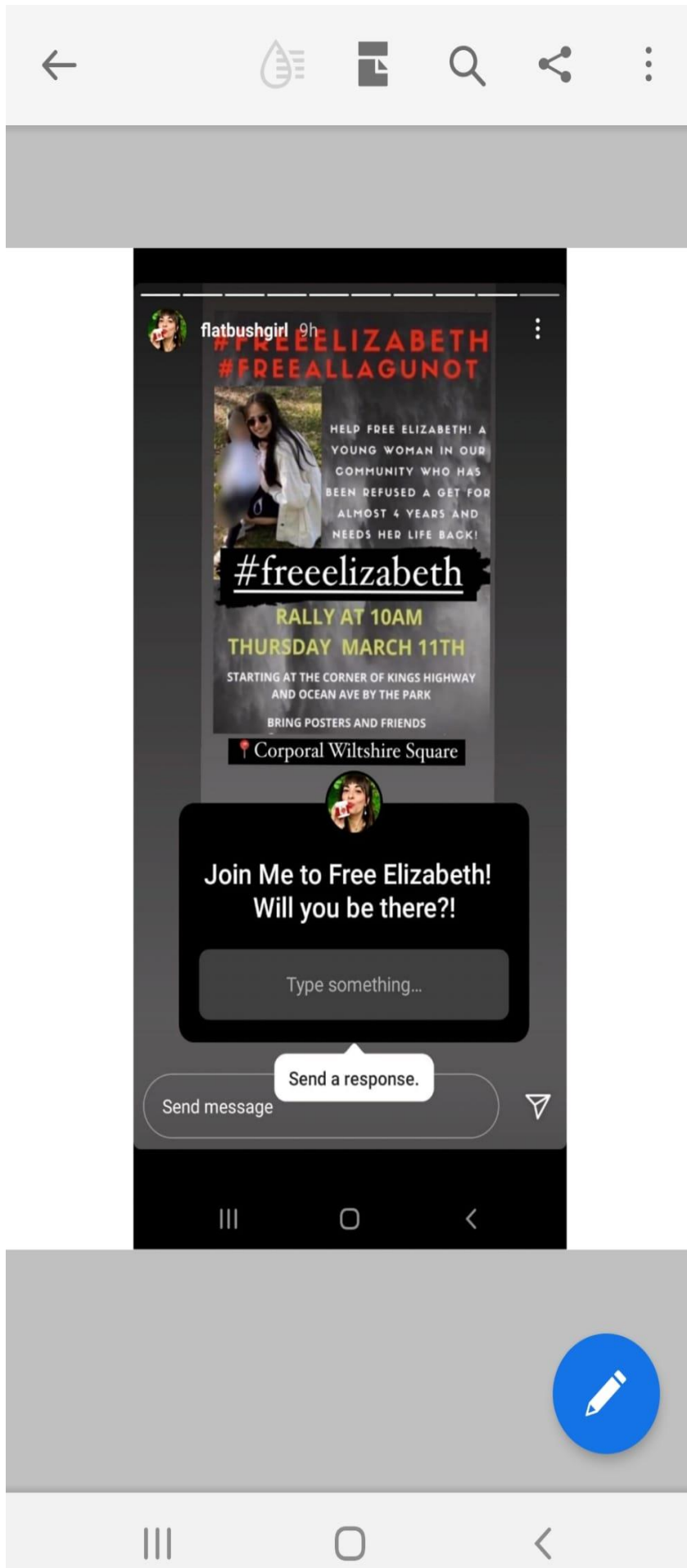
106. Shmuel advised me he was made aware of the mob protests and was afraid that if I slept at his home the mob would follow me to Albany and he was fearful for his property and well-being.

107. Shmuel advised me he would testify for me at trial.

108. I could not sleep home that night as I had a friend of mine check my property and he advised me there were several vehicles circling the block throughout the night, apparently waiting to see if I would show up. In the end, I found a friend of mine willing to let me sleep in his house in Long Branch, New Jersey.

109. On March 11, 2021, an illegal protest took place at the corner of Kings Highway at Corporal Wiltshire Park. My father's medical practice is located down the block from said park at 2136 Ocean Ave, Brooklyn, New York 11229.

110. The protestors intent was to come down the block to my father's office as evidenced by the flyer with a picture of my wife and daughter for said protest as seen here :



111. On March 11, 2021, in Brooklyn, New York at Corporal Wiltshire Park, Laurie Beda participated and co-led an illegal protest consisting of approximately 60-80 people.

112. Numerous cardboard signs stated, “Free Elizabeth” and “withholding a get is abuse”.

113. Only one police car is shown in videos of the protest, with zero officers outside controlling the unruly protests who were spewing threats directed at me and my family.

114. I personally advised the police at the 61st precinct the prior day, March 10, 2021, that an illegal protest was planned against me, and the protestors were going to go to my father’s medical office.

115. The protest was certainly illegal as the New York City rules require permits for protests to be requested at least 2 weeks prior to protest in addition to a separate permit for loudspeakers, which were used at the protest.(these rules might have changed since March)

116. The protest was only organized after the chesedfund campaign was launched on March 8, 2021.

117. There is no question that I was the subject of the cardboard messages and all the threats stated at the protest as evidenced by Heshy Tischler’s public video he posted on his Instagram account where he states while at the protest “We are at a demonstration. This guy Elliot Hirsch did not give a GET. And we are here demonstrating.” Essentially, I was accused of being an abuser and of kidnapping my wife or of the crime of false imprisonment.

118. There were two separate women, Adina Miles, and Amber Adler, who were using a loudspeaker to scream such things as “ no get , no peace” at the protest and Laurie Beda can be seen standing next to them at the protest, obviously supporting the message.

119. Adina Miles posted a thank you on her Instagram to “Elizabeth’s family(Laurie Beda and co.) and friends, who were ready to march to Elizabeth’s ex-husbands place of residence and workplace to ask for her freedom”. Accordingly, they admitted that they were conspiring together and that they were going to come to my home if I didn’t give them what they wanted.

120. A rabbi from the community of my wife came to the protest to attempt to dispel the protestors and order them not to come to my father’s medical practice down the block. He pleaded with the protestors, specifically Laurie Beda, not to take the protestors to my father’s office.

121. In a video I can provide this Court, Laurie Beda, while leading a group of protestors, screamed in a threatening tone, with the mob behind her, “if he doesn’t give the GET today, we will be there(pointing to my father’s office) tomorrow. And then their house (my home and my father’s home) tomorrow.”

121. I received this video of Laurie Beda stating the aforementioned threats while in the State of New Jersey.

122. The Rabbi then stated that he would help Laurie Beda lead the protest the next day if I did not give the GET that same evening, March 11, 2021.

123. Rabbi David Ozeri then stated to Laurie, “this is the closest we ever got” and Laurie Beda responded, “only because of this”. Accordingly, Laurie’s actions were intentional and maliciously directed at me.

124. Then Laurie publicly mentioned a former i-card and order of protection that was issued against me in New York State.

125. Then Rabbi Ozeri stated, “people said he ran away last night” to which Laurie Beda responded, “he went to deal last night”, referencing the town Deal, NJ which is what the Syrian Jews refer to the Deal, NJ area, including but not limited to the towns surrounding Deal, NJ including Oakhurst, NJ.

126. Accordingly, Laurie Beda was stalking me and my whereabouts.

127. The Rabbi did his best to keep the protestors from coming down the block to my father’s medical office that day and in fact the protestors did not come down the block to my dad’s office because the Rabbi promised them I would give the GET that day.

128. Upon information and belief, Laurie Beda advised people to call my dad’s office line number and bombard his office lines with phone calls with people screaming “give a get” to my dad’s secretaries. My father’s secretaries received calls every 20 minutes or so with unknown people stating, “give the get”. It greatly disrupted my father’s medical staff.

129. My father was extremely upset and perturbed by the set of circumstances he was facing that day and with the future threats of protests outside his office.

130. He advised me that if I did not give the GET that night he would have no choice but to permanently throw me out of his home because of Laurie Beda's threat to bring the mob rioters to his home and medical office.

131. My father was facing extreme pressure from the threat of the mob, which is exactly what the mob attempts to do by attacking not only the husband but the entire family of the man they deem is a Get refuser.

132. My relationship with my father deteriorated overnight because of the credible threats of Laurie Beda.

133. My father and I did not want any Hirsch properties to be egged and trashed like the mob did the previous nights to Dibo Hafif's home.

134. The cops explicitly stated they would allow the mob to egg our home and the only thing I could do to protect my father's properties, one of which is my permanent residence, was to give the GET as the Defendants demanded.

135. Therefore, because of Laurie Beda's actions I had no choice but to give the GET.

136. Upon information and belief, Laurie Beda, then advised people to leave bad reviews on my father's name on google review. Four separate reviews were made March 11, 2021, by people with names not listed in my father's patient list database all stating lies and leaving terrible reviews for my dad, which he advised me that attorneys advised him it will cost him thousands of dollars to remove the posts(he also told me he is not even sure that it's possible to remove the posts). By hurting my father's business, Laurie Beda made me suffer since my father is the one who gives me a place to live and loans me money for basic living expenses when my income does not cover my expenses.

137. On March 10, 2021, a woman can be seen on video surveillance on my father's property located at 1861 East 22nd Brooklyn, NY 11229, dropping off papers which stated "Free Elizabeth. Give her a GET". This woman then came into the backyard of our property and dropped off leaflets. I presume Laurie Beda sent this woman to our home. It is possible that the woman was one of her daughters, but the video is not clear enough to confirm that.

138. During the summer of 2018, Laurie Beda engaged in a malicious campaign of besmirching my name throughout the Syrian Jewish Community, which Elizabeth Kairey, Laurie Beda, and Norma Tawil, are all members of, regarding Elizabeth Kairey and the *GET*. Moreover, Leon Beda, the husband of Laurie Beda, personally advised me back in 2018 that his wife pressured him to donate money to the legal expenses of Elizabeth Kairey. He told me that he obliged to his wife's request but advised her he would not be continuing to fund her litigation. He told me he gave around \$1000 and told his wife he would not be giving any more money as he felt that it was equivalent to throwing money in the garbage.

II. DEFENDANT NORMA TAWIL

139. Norma Tawil goes by Norma. Tawil on her Instagram account. Norma is the daughter of Laurie Beda.

140. Norma Tawil has a picture of her and her husband, attorney Ralph Tawil, and one child(presumably their child), as her icon photo on her Instagram page.

141. On or about, March 11, 2021, Norma Tawil stated on one of Manopla's live videos, "Elliot I feel bad for you that you sit home all day doing nothing except troll Abe's page. Get a life. Fake attorney. I bet you failed the bar exam more than once."

142. On or about March 11, 2021, a comment was posted under the name Norma Tawil on the webpage campaign chesedfund mentioned prior that stated, “free Elizabeth so that she can get her life back”. A reasonable person reads this comment as accusing me of the crimes of false imprisonment and/or kidnapping.

III. DEFENDANTS HESHY TISCHLER AND AMBER ADLER

143. Amber Adler and Heshy Tischler are two separate individuals who were running for New York City Council 48th District during the week of March 7, 2021-March 12, 2021. Both potential councils lost the election by a wide margin.

144. Amber Adler and Heshy Tischler both utilized their social media platform including but not limited to Instagram, which they have thousands of followers, to engage in a serious harassment, defamation, and intimidation campaign of Jewish orthodox men, me included, who have not granted their respective wives a GET.

145. Amber Adler and Heshy Tischler both engaged, incited, and participated in illegal riots/protests in Brooklyn, New York the week of March 8, 2021. Both Amber Adler and Heshy Tischler advocated lawless behavior.

146. On March 10, 2021, Heshy Tischler and Amber Adler both were present, participated and incited an illegal riotous protest of a man named Dibo Hafif.

147. Said protest took place at 2136 East 5th street Brooklyn, NY 11223. I have video evidence of both of these Defendants at the riot.

148. On one of the live videos of Manopla, a guest appeared and was present at the Dibo riot and advised Manopla that there were approximately 1000 people at the riot and that people were throwing eggs at Dibo's house.

149. The mob blocked the public street, threw eggs at Dibo's home, screamed, and honked car horns from approximately 830pm to 2am that night.

150. The mob also destroyed the air conditioning units on Dibo's property.

151. Only one police car is seen in the numerous videos of the Dibo riots and no attempt by the NYPD was made to disperse said riot.

152. At several points during the rally Heshy Tischler and Amber Adler both incited more hatred towards Dibo Hafif by acting as leaders of the riot and speaking on loudspeakers to the protestors. Chants were being screamed "Heshy, Heshy, Heshy". Once Heshy was seen at the riots more and more people showed up.

153. Heshy Tischler specifically stated that he would state Dibo's name on his show every single day until he gave a *GET* in an effort to publicly humiliate him. He said he would do this to every man who doesn't give his wife a GET.

154. Amber Adler held up a large sign at said protest which read "No GET-No Peace" thereby advocating unruly and lawless behavior.

155. Heshy and Amber used this massive riot which gained tremendous social media attention as an opportunity to promote themselves for their respective campaigns running for New York City Council.

156. The following day, March 11, 2021, both Amber Adler and Heshy Tischler attended and co-led an illegal protest at the corner of Ocean Ave and Kings Highway in Brooklyn, New York that was specifically organized in order to pressure/harass/intimidate me to give my wife a GET.

157. Said protest was mainly promoted by Adina Miles, but several other highly popular Instagram accounts posted a flyer urging people to attend this protest. Said flyer was posted in the previous paragraphs of this complaint.

158. A picture of my wife, Elizabeth Kairey, with our daughter(whose face was blotted out) was put on the flyer for this protest.

159. The purpose of the protest was to coerce me into giving my wife a GET.

160. Several Instagram posts specifically stated that the purpose of the protest was to humiliate me publicly and bring my divorce matter to the public eye so that I would be pressured into giving my wife a Jewish divorce. Indeed, I received hundreds of texts and phone calls about this protest and all my friends, and my family were worried for my safety and well-being.

161. Amber Adler and Heshy Tischler both gave speeches at this protest to the unruly crowd of illegal protesters.

162. At the time of the protest, according to NYC 311 website, all protests with over certain number of individuals, which this protest certainly was over the limit, must have a legal permit. A permit must be applied for at least 2 weeks prior to the protest. Moreover, if a loudspeaker will be used, a special sound permit must be applied for as well.

163. Said protest was only organized a couple days prior to the March 11, 2021, protest. Accordingly, it is technically impossible that the protest was legally permitted yet the NYPD did not disperse the protest and Heshy and Amber, by definition, participated in an illegal protest directed at me.

164. Only one police car was present for said protest which, according to videos had circa 60-80 people present.

165. Amber Adler and Heshy Tischler both held up a giant sign which stated, “No GET, No Peace”. Accordingly, Amber Adler and Heshy Tischler were advocating for unruly and unpeaceful behavior towards me and my family members. Additionally, Heshy posted a video of himself at the protest, smiling in a picture with Betti and Alex Missry, my wife’s first cousin, see below picture:



Video



heshy_tischler • Following



2,493 views

heshy_tischler Thank you Heshy Tischler for your

166. The previous night at the Dibo riot, it was explicitly stated by the mob leaders on loudspeaker that the following day a “rally” was taking place at King Highway and Ocean Ave. And it was requested from the crowd that they attend the “rally” at Kings Highway.

167. Accordingly, I have irrefutable evidence proving that the mob leaders of the Dibo riot were in concert with the organizers of the protests and riots directed at me.

168. Additionally, at the March 11, 2021, protest, the mob members stated they were heading to my home and father’s office the following day if I did not give the GET that night.

169. At the Kings Highway protest, Heshy Tischler stated publicly in a video he posted to his Instagram account the following statement: “ we are at a demonstration. This guy Elliot Hirsch did not give a GET. And we are here demonstrating, and we are going to get that *GET*.” Then Heshy said “So I just spoke to this guy Jeffrey Stern, a federal Judge, that is guaranteeing Dr. Hirsch, actually Mr. Hirsch will give the *GET*. They are asking us not to come over there to Dr. Hirsch’s office, I know you want to go over there.”

170. I received all of these threats that day when the protest was occurring. Moreover, these videos are still posted on internet for the public to view, which causes me severe and intense emotional distress, under the hashtag #freeelizabeth which can be searched for on Instagram.

171. On March 12, 2021, Heshy Tischler posted a picture of himself at the protest with a caption stating Elizabeth Kairey Hirsch got her get.

172. Amber Adler also made a public speech at the protest, which she posted on her

Instagram account as well, advising the crowd that she will help these women who have no *GET*'s, obviously including my wife, who the protest was organized for. She accused me of committing abuse to my wife.

173. Amber Adler then stated to the crowd that she is trying to get a bill passed in the New York State Legislature that would make not giving a GET a felony in New York.

174. Both Amber Adler and Heshy Tischler were aware that by coming to my protest and speaking about me and my personal divorce matter to their thousands of followers that it would cause me much public humiliation, cause me severe emotional distress and intense harassment.

IV. DEFENDANT ADINA MILES

175. Adina Miles is a woman who has an Instagram account called "flatbushgirl".

176. On or about March 10, 2021, Adina Miles' Instagram account had roughly 55,700 followers.

177. On or about March 9, 2021, Adina Miles posted on her Instagram account a picture of my wife with the caption "free Elizabeth". On said flyer was a call to all of Adina Miles' followers requesting their attendance at an impromptu protest starting at Corporal Wiltshire Park located in Brooklyn, New York at 10am on March 11, 2021. Said flyer was posted in this complaint in paragraph 110.

178. Adina Miles, who has a highly popular Instagram account, helped organize an illegal protest to commence at said park with the intention to come down the block to my father's medical practice.

179. According to Ms. Miles, the express purpose of the protest was to publicly humiliate me and pressure me and my family until I gave my wife a GET and “set her free”.

180. On March 11, 2021, Adina Miles was one of the people leading the protest at Corporal Wiltshire Park.

181. According to the 311 websites of NYC, protests need valid permits and if using loudspeakers, sound permits are additionally required. Adina Miles is seen in videos using a loudspeaker at said protest in addition to Amber Adler as well who used a loud speakerphone.

182. At said protest, Ms. Miles, specifically stated that if I do not give my wife the GET that day she would come back the following day to continue protesting. She further confirmed this by a post on her Instagram account the same day.

183. Ms. Miles was part of a group of women that specifically stated they would bring the protestors to my father’s medical office and then our home(presumably both of my father’s homes as the previous night there was an illegal riot at my Oakhurst residence and there was a police car outside my father’s Brooklyn home the night of March 11, 2021) the following day should I not give my wife the *GET* that day March 11, 2021.

184. On or about March 11, 2021, Adina Miles posted on her Instagram account videos of the protest, and she acknowledged all of the above-mentioned threats that were made to me.

185. I received all of these videos and posts via electronic means while in the State of New Jersey.

186. The next day, March 12, 2021, Adina Miles, posted a flyer which stated, “Elizabeth is free”. She captioned the flyer with a warning on her Instagram account advising all

“get refusers” that you will be next. It is obvious that she was referring to me as the first GET refuser she went after.

187. She then stated, “we will publicly humiliate me, we will have you fired from your job, we will find ways to have you arrested” and “we will not rest until every prisoner is set free” as shown in the below photo:



Liked by **juniors_jewels** and **3,586 others**

flatbushgirl Social media works.

Activism works.

Pressure works.

⚠️ Attention Get Refusers ⚠️

YOU'RE NEXT.

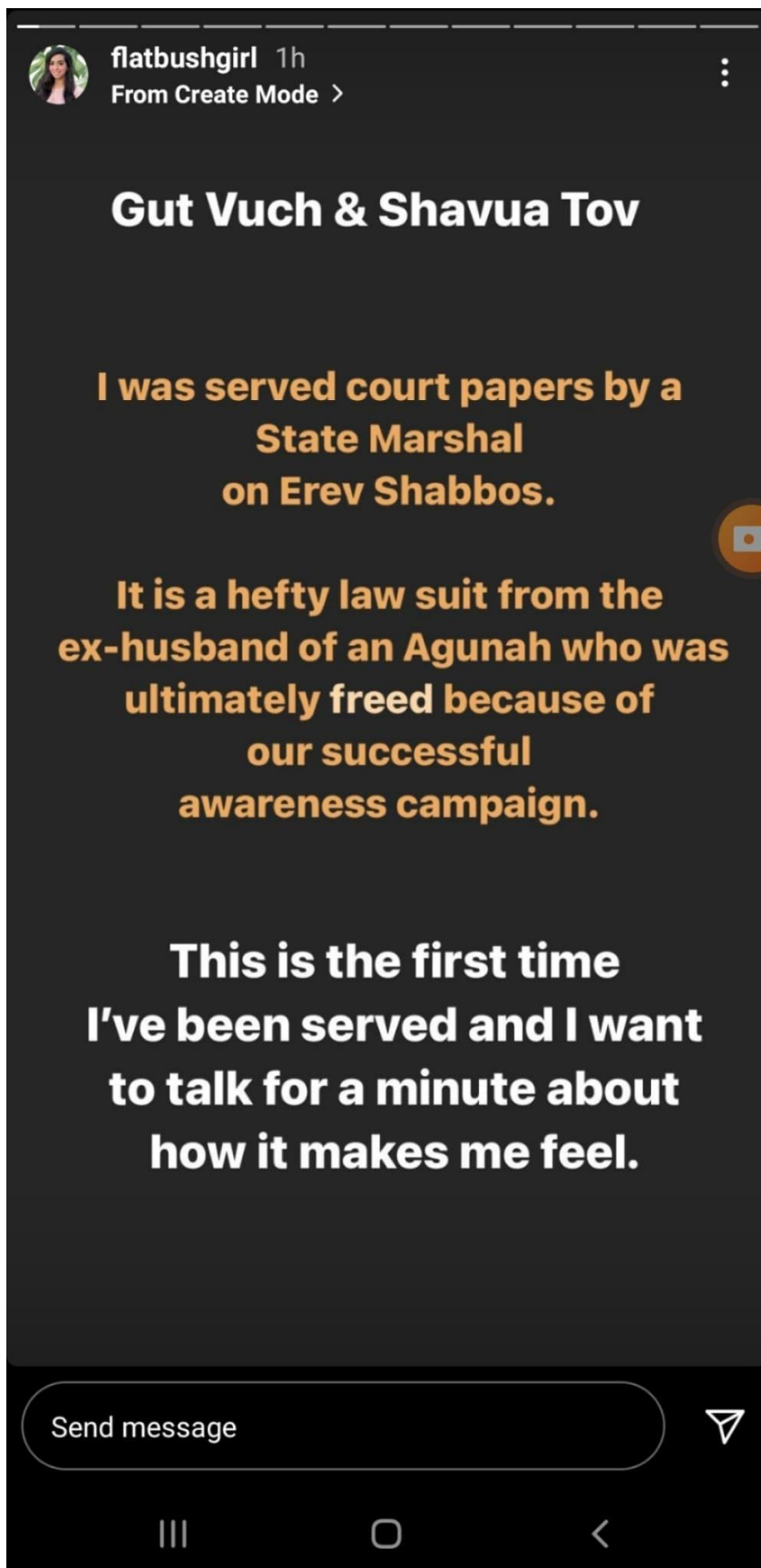
We will have you fired from your job.

We will publicly humiliate you.

We will find ways to have you arrested.

And we will not rest until every prisoner is set FREE.

188. On or about August 15, 2021, after the U.S Marshalls served Adina Miles with the previous complaint filed in this Court, Ms. Miles took to her Instagram account to double down on her harassment of me by publicly advising her 50,000 followers that she was served with a lawsuit “from the ex-husband of an Agunah who was ultimately freed because of our awareness campaign” as seen here :



189. She also advised her followers that the lawsuit is public knowledge and thereafter I received numerous text messages from people asking me if I was the one to sue Adina Miles being that Adina Miles publicly advertised my divorce controversy.

190. Additionally, Adina Miles used her harassment campaign against me to gain fame and enrich herself and this culminated in her being photographed and interviewed by The Vogue magazine company.

191. Vogue is quoted as stating “[d]uring the rally, Miles-Sash and a group of women were approached by a prominent local rabbi who offered to broker the get. “And we were like, ‘We’re not backing down,’” says Miles-Sash. She filmed the interaction and later put it on social media. “We had 40,000 views,” says Miles-Sash. That night at 8 p.m., the woman received her get.”⁹

V. DEFENDANT YESHIVA OF FLATBUSH JOEL BRAVERMAN HIGH SCHOOL

192. Yeshiva of Flatbush High School located in Brooklyn, NY sent about 10 or so of their female students to attend the illegal protest at Kings Highway and Ocean ave as can be seen in this photo where the girls and their supervisor stand together holding a sign stating, “let her go”, accusing me of the crime of either false imprisonment and/or kidnapping :

⁹ <https://www.vogue.com/article/agnah-get-refusal-social-media-campaign-orthodox-women>

Bklyner.



In the meantime, the agunot protests will likely continue, and many hope they will spur more lasting change.



Students from the Yeshivah of Flatbush High School at a recent protest. (Image: Adina Miles-Sash/[FlatbushGirl](#))

193. According to a Manopla live, Yeshiva of Flatbush gave the girls who came to the protest “chesed hours.”

194. Yeshiva of Flatbush requires its students to participate in 50 hours of community service per year in order to move on to the next grade. I know this information because I am a former student of the Yeshiva of Flatbush High School.

195. The term chesed hours refers to the community service the Yeshiva requires its students to participate in.

196. It is obvious that these Defendants or my wife and her family contacted the Yeshiva of Flatbush to send students to harass and publicly humiliate me.

197. Yeshiva of Flatbush is one of the premier Jewish Orthodox educational institutions.

198. By endorsing the harassment against me, the Yeshiva of Flatbush created the impression to the public that this cause was righteous and praiseworthy.

199. The Yeshiva of Flatbush sent its students on a school day with the express purpose of publicly humiliating me and harassing me to give my wife a GET.

200. I believe this Defendant is the most respected and high powerful entity/individual listed in this complaint and its participation truly destroyed my good will and reputation in the community for years to come if not permanently.

201. Yeshiva of Flatbush is a school that I attended from 5th grade through 12th grade.

202. This Yeshiva is well aware of my ADHD condition as I was routinely seen by the school therapists in addition to receiving extra time on my examinations.

203. This Yeshiva displayed incomprehensible behavior by intentionally sending its students, on a school day, to a protest, which was not legally organized, for the express purpose of harassing and shaming me into giving my wife a GET.

VI. DEFENDANT ELISHEVA YARIMI

204. Elisheva Yarimi is a woman who has around 11,000 Instagram followers and her Instagram name is called iitsanellie.

205. Elisheva was one of the leaders of the mob at Dibo Hafif's riots and I can present videos to this Court showing her doing so.

206. Elisheva posted on her Instagram account that Dibo was put in jail. A fact which is verified by a video and numerous news site which shows Dibo being arrested by the NYPD.

207. According to news media sites, a member of the Syrian community convinced Dibo's current wife to have Dibo arrested.

208. On March 10, 2021, at the Dibo protest, Elisheva Yarimi publicly advised the mob to attend the Kings Highway and Ocean Ave rally the next day at 10am.

209. The next day, March 11, 2021, Elisheva posted a flyer on her Instagram account that stated the mob should focus their efforts on me as seen here:



iitsanellie 10m
From Create Mode



UPDATE:
JEFF HAFIF HAS BEEN ARRESTED.

THE RALLY FOR EVET WILL NOT BE HAPPENING TONIGHT
AS THE ABUSIVE JEFF DIBBO HAFIF IS NOW IN JAIL
THANK GOD.

HOWEVER, LISTEN UP.
WE ARE NOW TAKING OUR FOCUS TO ELIZABETH KAIREY.
HER HUSBAND ELLIOT HIRSCH HAS REFUSED ELIZABETH A
GET FOR OVER 4 YEARS.

JOIN ME IN USING OUR VOICES TONIGHT TO GET ELLIOT
HIRSCH TO GIVE ELIZABETH A GET.
HELP US HELP ELIZABETH AND HER DAUGHTER MOVE ON.

ADDRESS AND LOCATION WILL BE POSTED SOON.

STAY TUNED.

TURN NOTIFICATIONS ON.

210. She stated that a protest was planned at my home for that night March 11, 2021, and as will be discussed in the forthcoming paragraphs, she was waiting to hear whether or not a GET was given by me.

211. Although Yarimi stated in her public flyer to use “voices”, the mob, in fact, dumped dog feces, threw eggs, broke air conditioning units, honked horns and blocked the entire street at the home of Dibo Hafif.

212. If I did not give a Get to my wife on March 11, 2021, it is absolutely certain that the mob would have surrounded both the home in Oakhurst, NJ and Brooklyn, NY.

213. To further buttress these allegations, this same mob attacked a man named Joseph Michon the following weeks after I gave my wife a Get.

214. There are videos posted online of dozens of people harassing Michon at the JFK international airport in addition to videos of hundreds of people outside his Brooklyn home where they again, threw eggs, honked horns, and caused a civil disturbance in the evening hours of a weekday.

VII. DEFENDANT NOURITE MAIMON

215. On March 11, 2021, Ms. Nourite Maimon stood beside Laurie Beda protesting me at Kings Highway and Ocean Ave.

216. On March 11, 2021, at about 3pm, after Ms. Nourite Maimon attended the protest, she appeared as a guest on a Manopla “live” titled “hirsch update.”

217. During this live, Ms. Maimon stated “looks like Elliot Hirsch is playing around ,which is nothing new, and the minute we hear that this GET is not going through, really,

everybody in this community that has a pulse has to be there(the planned illegal mob riot for 9pm, March 11, 2021, at 1861 East 22nd street, Brooklyn, NY 11229) to support Elizabeth. The march this morning I was there, to tell you the truth the show was a little disappointing. And when Rabbi Ozeri said he would be there the next morning, I felt that would really make a statement. I don't have much to say except that every person in this community needs to be there and I know its Friday morning and its shabbat. This is a human rights issue. And its everybody."

218. She then stated, "don't let the pressure down." And she said that "Rabbi Ozeri said that the only reason this family is at the table as we speak is because all of us are putting on the pressure."

219. She then stated, "wrong is wrong". I do not stand by people who do wrong to other people".

220. She then stated, "our rabbis cannot do this alone." "We, as a people, have to come together and we are an army and Elizabeth needs her army."

221. Ms. Maimon then stated, "but guess what. Elliot Hirsch keeps referring to himself as a lawyer, lawyer, lawyer. He is no lawyer. And we have a real lawyer on our hands who is ready to go to battle for us, Moshe Maimon."

222. Moshe Maimon is a partner at a prestigious law firm called Levi Konigsberg LLP.¹⁰ and according to his wife, Nourite, he was ready to "battle" for them should the need arise. Based upon the context of Ms. Maimon's statement I believe it's reasonable to assume that she was stating her husband would litigate for her and all those who would need assistance should the need arise. Apparently, Ms. Maimon subscribed to the same sentiment stated by

¹⁰ <https://www.levylaw.com/lawyer/moshe-maimon/>

Manopla on one of his lives where he explicitly stated he was worried about potential lawsuits being filed against all the parties involved.

VIII. DEFENDANT EVE SCABA

223. On March 11, 2021, at about 3pm, Ms. Eve Scaba appeared as a guest on a live commenced by Manopla titled “hirsch update.”

224. On said live, Ms. Eva Scaba stated that she attended the protest at Kings Highway and Ocean ave which was organized specifically to harass and pressure me to give my wife a GET.

225. On said live, Ms. Scaba stated my name “hirsch”. And said it’s not fair what is happening to Elizabeth.

226. Manopla then stated on this live to Eva Scaba , “but you know again it’s their life(referring to Elizabeth and me), you know what I mean. You know there is so much you can infringe on other people’s lives; you know what I mean.”

227. After Manopla stated this to Eva Scaba, Ms. Scaba then stated “ honestly, I think everyone should go tonight. And that is what we said we are going to do. 9 or 10pm at night. If nothing happens by then. We need to go again. To which, Manopla said, “where, the parent’s house?”, which Eva responded “of course”. Manopla then said, “but what if he is not at the parent’s house”. And then Eva stated, “who cares”, “it is the same thing with Dibo. Everyone went to the house, and he was not there.”

228. During this conversation, there were many people commenting on the live video attacking Manopla for “defending me.”

229. Manopla was reading the comments and stated to the followers, “Guys. These commenters. I am not defending him. I am not defending him.”

230. Manopla received not even a 1% fraction of the harassment and threats that I received, by the mob members, non-stop during the week of March 8, 2021, up until I gave my wife a GET.

231. On the live video between Saul Harari and Manopla mentioned in the introduction of this complaint, Saul told Manopla “remember when the mob turned on you for defending hirsch”, which further evidences the plethora amount of people that were exposed to these live Instagram videos.

IX. DEFENDANT LAUREN DAGMY

232. On or about March 10, 2021, Ms. Lauren Dagmy posted a photo of me with several captions that read: Get refuser alert, Elliot Hirsch, Justice for Elizabeth.”

233. Ms. Dagmy, who has an Instagram account named Len_dagmy, posted said photo on her Instagram story for all of her 703 followers to see.

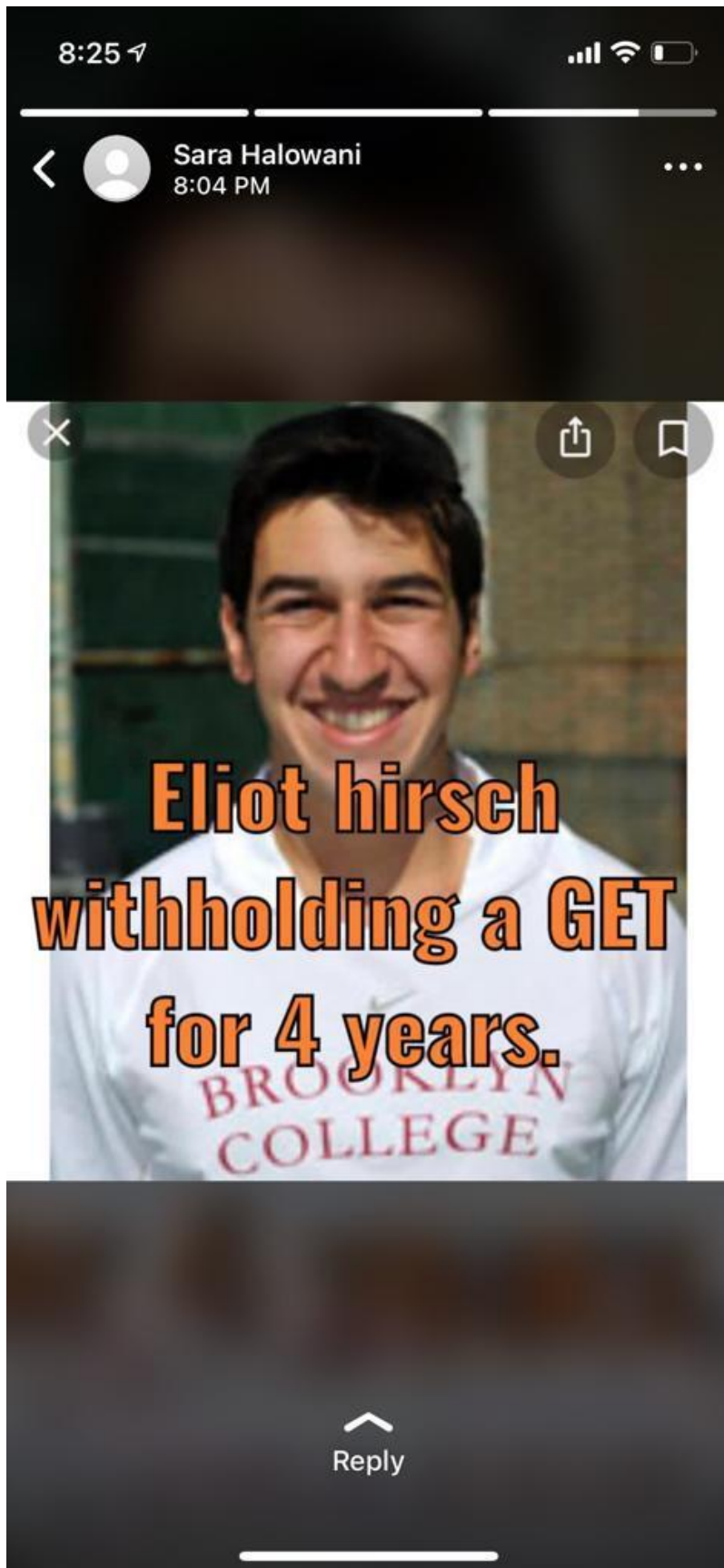
234. Said post was shared by thousands of people but I only can prove that this lady posted said flyer about me seen here:



X. SARAH MIZRACHI

235. During the week of March 8-March 11, 2021, Sarah Mizrachi posted on her WhatsApp Status a picture of me and my parents publicizing the fact that I was “withholding a get” as seen here:





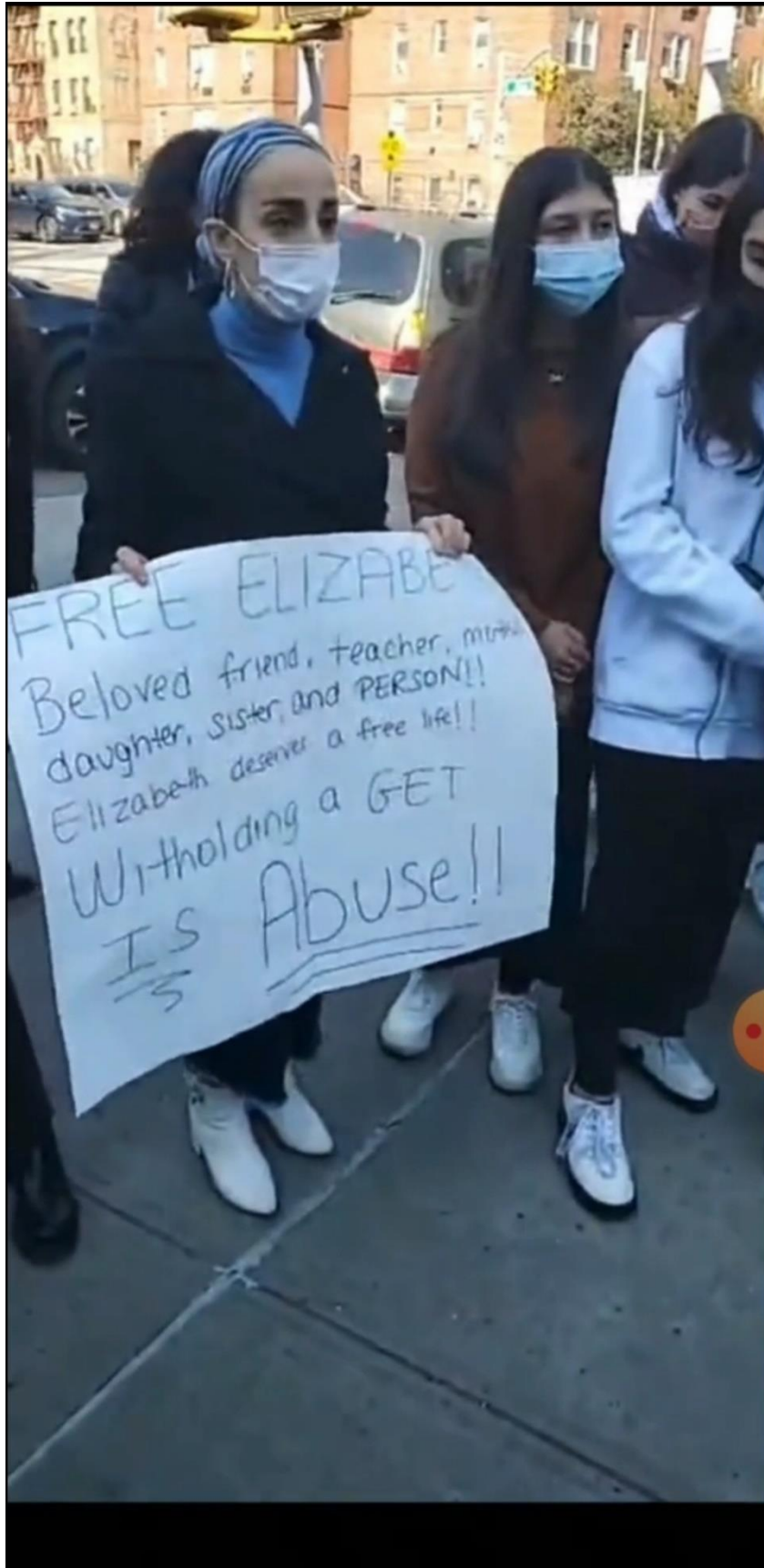
236. On or about March 8- March 11, 2021, Sarah Mizrachi, who is the owner of the account called gourmet_handmade, posted a comment on Eva Shammah's public post publicizing the chesedfund campaign against me.

237. Sarah stated: Get refuser is Elliot Hirsch. Parents are Dr and Paulette Hirsch.

XI. YAFAH SUTTON

238. On March 11, 2021, Yafah Sutton attended the illegal protest at Kings Highway and Ocean Ave.

239. Yafah was photographed holding up a sign in a public forum which accused me of abuse as seen here:



**FIRST CAUSE OF ACTION-INTENTIONAL INFLECTION OF EMOTIONAL
DISTRESS**

240. Plaintiff repeats, reiterates, and incorporates the allegations contained in paragraphs numbered “1” through “239” herein with the same force and effect as if the same were set forth at length herein.

241. On a claim for intentional infliction of emotional distress, the plaintiff must prove that the defendant acted intentionally or recklessly; the defendant must have either intended to do the act with the intent to produce the emotional distress or acted recklessly in deliberate disregard of a high degree of probability that emotional distress would follow.

242. In order to establish a claim for intentional infliction of emotional distress, the plaintiff must prove that defendant's conduct was extreme and outrageous, and the conduct must be so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency, and to be regarded as atrocious, and utterly intolerable in a civilized community.

243. Plaintiff seeking to recover for intentional infliction of emotional distress must prove that defendant's conduct was a proximate cause of plaintiff's emotional distress.

244. On a claim for intentional infliction of emotional distress, the emotional distress suffered by plaintiff must be so severe that no reasonable person could be expected to endure it.

245. On a claim for intentional infliction of emotional distress, when the conduct is directed at the plaintiff, she need not prove physical injury; it is sufficient that the conduct produced emotional distress that is severe.

246. All the Defendants engaged in conduct deliberately and expressly intended to cause me such severe emotional distress that I would have no option but to give in to their demand that I give my wife a GET.

247. Many of the Defendants acknowledged that their pressure methods were intended to “bring me to the table” and get me to give my wife a GET. And even Manopla stated in one of his lives that “elliot won’t be able to handle the crowd. He is going to give the get.”

248. The Defendants engaged in a public humiliation campaign on Instagram and at live in-person protests for the sole purpose of causing me such intense emotional distress that I would have no option but to give in to their demand that I give my wife a GET.

249. The Defendants actions were not only directed at me but at my extended family members as well for the sole purpose of causing me internal family strife, which they succeeded in doing so.

250. My mother, who works at a Syrian Jewish Community school was being threatened from being fired as teacher in her job at Magen David Yeshiva,

251. It is noted that the Syrian community uses a derogatory term for Ashkenaz Jews¹¹ such as myself and Manopla called me a j-dub on one of his lives.

252. The conduct engaged in by all the Defendants was outrageous and extreme and is utterly intolerable in a civilized society.

¹¹ See <https://www.nytimes.com/2007/10/14/magazine/14syrians-t.html>

253. The Defendants engaged in a deliberate intense campaign of oppression, humiliation, and intimidation so that I give my wife a GET.

254. The express purpose of the Defendants actions was to violate my freedom of religion and force me to do something which is constitutionally protected under my first amendment right of freedom of religion.

255. There can be no tolerance in a civilized society for individuals to engage in coercive, harassing, and threatening actions in order to force people to do things regarding their religious beliefs.

256. The conduct of the Defendants must be punished with strong force so that people in society understand that they cannot coerce individuals to do things that are protected under the first amendment of the United States Constitution.

257. Solely because of the actions of these Defendants I am now in need of continuous therapy and trauma treatment.

258. All the Defendants intentionally brought my divorce controversy to the public attention and stated lies about me that I was withholding a GET and I was committing abuse.

259. The statements made by the Defendants caused me intense emotional suffering.

260. By publicly calling me an abuser and a GET refuser the Defendants caused me much humiliation in the community.

261. My reputation has been irretrievably damaged, and I have absolutely no ability to ever get married again to an Orthodox Jewish lady as my name is associated with being a GET refuser and causing a woman to be an Agunah.

262. In reality, my wife is not and was not an Agunah. A video posted to social media by the Badatz Bes Din of Lakewood, coherently explains that women such as my wife, who are suing me in secular court for divorce are not considered Agunos.¹² In fact, the Chief Rabbi of this Bes Din publicly spoke about this divorce controversy as he and many Bes Din's throughout the country are aware of the actions of Adina Miles, the Flatbushgirl, and the Bes Din's are furious with her actions simply because she creates situations where Get's are given that are retroactively deemed invalid.

263. The videos of the protests and much of the harassing comments directed at me are still up on Instagram and searchable under the hashtag #freeelizabeth.

264. My reputation is permanently damaged, and I will now suffer severe emotional distress the rest of my life because of the Defendants.

265. Several of these Defendants are widely popular and highly respected political and educational figures and their involvement in the harassment campaign against me created a juggernaut force that I had absolutely no chance for survival.

266. The Defendants succeeded in their mission to cause me intense emotional distress.

267. On May 12, 2021, I received a letter from Ashley Egleston, a licensed counselor at Ocean Township Human Services which states " Dear Mr. Hirsch, on May 5, 2021, you had participated in a consultation at this agency. Information presented during this consultation indicates the need for further assessment by way of a psychological evaluation. It is also

¹² <https://rumble.com/vl40z3-rabbi-knopfler-av-bes-din-badatz-of-lakewood.html>

recommended that you present for a psychiatric evaluation to determine if you are a candidate for medication. This recommendation is not in the agency's scope of practice. As such, it is recommended that you present to an agency providing both of these services to best serve you. Below you will find agencies that historically provided both services. "

268. I contacted both of the service providers that Ms. Egleston recommended to me. Only one of them got back to me, namely, CPC behavioral healthcare. After speaking to CPC, they recommended me to Penn Medical Princeton Health.

269. I have spoken to the intake unit at Penn Medicine Princeton Health, and they have determined that I qualify for the men's trauma therapy program. However, said program is fully booked and they have placed me on a waiting list.

270. I am in deep need of therapy due to the actions of the Defendants that took place the week of March 8, 2021, and the permanent posts now spread out on the internet that associate me with being a get-refuser and causing Elizabeth to be an Agunah

271. Being that I am unemployed, I receive Medicaid insurance from New Jersey, and it took months of searching but I have finally found Dr. Richard Kessler, a licensed psychologist, who accepts Medicaid and I have commenced weekly therapy sessions with said Doctor.

272. I have much trouble sleeping, eating, socializing, exercising, and doing daily chores around the home.

273. Because of the Defendants actions I now suffer from depression, nightmares and difficulty being engaged and functioning as a regular person in society.

274. Because of the Defendants actions I now suffer from severe anxiety, trauma, nightmares, and fear.

275. Prior to March 8, 2021, I did not suffer from any of these conditions. However, none of my current symptoms affect my relationship with my daughter and I am fully able to parent and have custody of my child.

276. My temporary license that authorized me to practice law, which was signed by Presiding Justice Alan D. Scheinkman of the Supreme Court of New York Appellate Division 2nd Dep. has expired this August 2021.

277. Although I have not made any money in my position as a temporarily lawyer I was able to advertise and promote myself to provide legal services and my name spread and I did receive several phone calls with people seeking counsel.

278. Although I did not end up representing anyone, I did plan on taking the bar this July 2021 and then start practicing as a fully admitted attorney.

279. I believe that I was going to be able to start representing people after I passed the bar in July. But my reputation in the legal field has now been irretrievably damaged as the general public considers me an “abuser” and this is only because of the actions of each and every one of the Defendants.

280. It is submitted that I have been diagnosed with severe ADHD since about the age of 8 years old.

281. Additionally, I was recertified with ADHD not so long ago and I received extra time on both my LSAT and all law school examinations. I also received a private room for all examinations due to extreme difficulty in my ability to focus.

282. Laurie Beda, Norma Tawil, and the Yeshiva of Flatbush are all aware of my ADHD condition and should be held accountable for knowingly causing me additional stress that they knew would be exacerbated by my ADHD condition.

283. Because of the actions of the Defendants during March 2021, which was the time I was planning on dedicating to signing up for the Bar Examination and concluding my studies, I was effectively precluded from doing so by suffering the intense emotional distress I was subjected to by these Defendants.

284. I will now have a loss of future income as an attorney because of the Defendants actions in destroying my reputation and for causing me such emotional distress that I was unable to study properly for the Bar exam of July 2021. I now will not be able to an admitted attorney until at least the year 2022 and my temporarily license has now expired.

285. Because the Defendants brought my divorce controversy to the public attention and because Laurie Beda published the contents of the webpage, my wife gathered approx. \$128,000 in order to, *inter alia*, continue her lawsuit against me, which includes her attempt to eradicate me from our daughter's life. I am now going to be in divorce Court much longer than expected because my wife just got more money to continue her lawsuit against me.

286. I have been suffering parental alienation at the hands of Elizabeth Kairey as evidenced by a document signed by the Beth Din(see attached Exhibit).

287. By the Defendants bringing my divorce controversy to public light and by damaging my name publicly they have created the circumstances necessary that my wife needed to gather up such a large sum of money to continue her lawsuit against me.

288. To give just one example of the emotional distress that I am still subjected to because of the Defendants, after not having attended Temple services in over 4 months because of my anxiety and trauma, during July 2021, I was invited over by a long-time friend to his home for a Sabbath meal and prayers afterwards. When I arrived at the home there was approximately 25 men sitting at the dining room table. At one end of the table was a man named Isaac Cohen who is a member of the Shomrim Patrolmen, a Brooklyn neighborhood watch group that is a quasi-type of police enforcement. Shomrim works closely with the NYPD. Mr. Isaac Cohen, who has publicly commented on numerous lives of Manopla that I should “pay child support”, immediately began hurling threats at me. He stated that if I came near him I would not be able to walk out of the home that night. He further started screaming that I am an asshole and piece of shit. He repeatedly berated me that I should “pay child support” and that I am not a man. After about 25 minutes of non-stop the verbal harassment, one of the other men in the home advised Mr. Cohen that he must shut his mouth. At that point, the meal was over, and prayers began. I came home dejected and emotionally scarred.

289. On another occasion, I took my daughter to the pizza store in Brooklyn, NY about 2 months ago and in the pizza shop I was being stared at by a random woman. I asked her if I could be of assistance, and she said she recognized me from all the Instagram posts and asked me how I was able to walk around in the neighborhood after what happened to me. She said if I were you I would not be able to walk outside in public. Again, I felt dejected and emotionally scarred.

290. There cannot be any tolerance for people to band together, especially respected educational institutions, to galvanize thousands of people to engage in illegal protests and harass and coerce someone to do something he or she is legally entitled to do or not to do.

291. Said actions must be punished with severity.

292. Currently in our country we have many riots and protests against systemic racism and other general wrongs. There is no countenance for people to specifically target certain individuals and publicly encourage the masses to riot and harass said individuals to engage or refrain in permissible conduct. Such behavior is intolerable in a civilized society and must be punished with extreme measures in order to prevent them from happening again.

SECOND CAUSE OF ACTION-DEFAMATION

293. Plaintiff repeats, reiterates, and incorporates the allegations contained in paragraphs numbered “1” through “292” herein with the same force and effect as if the same were set forth at length herein.

294. To establish a prima facie case of defamation, a plaintiff must establish the defendant (1) made a defamatory statement (2) concerning the plaintiff, (3) which was false, (4) was publicized to a third party, and (5) caused damages to plaintiff.

295. A defamatory statement is one that is (1) false and injures another person's reputation, or (2) subjects a person to hatred, contempt, or ridicule, or (3) causes others to lose good will or confidence in that person.

296. All the Defendants deliberately intended to subject me to hatred , contempt, and ridicule.

297. Each and every Defendant intentionally attempted, successfully, to cause others to lose confidence in me and to take away any good will I have with others.

298. The explicit purpose of the Defendants actions was to publicly humiliate me, find ways to have me arrested and have me fired from my job.

299. The Defendants all were deeply involved in a campaign to bring my divorce controversy to the public eye with the express intention to cause me intense ridicule and public humiliation.

300. I received numerous messages from random people and people that I knew advising me to permanently leave town as my name is now permanently damaged in the community and at large.

301. All the Defendants are guilty of accusing me of withholding a GET and calling that abuse.

302. The Defendants accused me of abuse and said statement of fact was intentionally stated to cause me to lose goodwill in the community and subject me to hatred and ridicule.

303. According to Orthodox Jewish Law I was not withholding a GET. In fact, according to one of the exhibits I have submitted, the GET was not to be given until all my divorce issues between Elizabeth and I were concluded.

304. I am not legally divorced and according to the Beth Din, I am still unobligated and in fact, not supposed to give my wife a GET until my divorce is settled. This is why ORA was not involved in the Defendants harassment campaign against me.

305. I have never been convicted of a crime of abuse to my wife.

306. Laurie Beda is specifically responsible for publishing the contents of the webpage campaign on her Instagram page in which she helped my wife enrich herself by defaming me.

307. The contents of the webpage were extremely defamatory and false statements of facts.

308. All the comments posted on said page were, in context, meant to cause me public humiliation, such as comments like, elliot is evil, lets break his legs that bastard etc.....

309. I did in fact pay my wife child support and I was never in violation of a child support court order.

310. I have not appealed every decision of the Supreme Court, as the webpage campaign stated about me and said statement accused me of doing so and was meant to cause the public to view me as a vexatious litigant, which is a term that caused me to lose good will in the public eye and further hurt my reputation.

311. By bringing my personal divorce case to the public eye, all the Defendants intentionally caused the public to lose good will in me.

312. A defamatory statement is one that tends to harm the reputation of the plaintiff or to lower plaintiff in the estimation of the community or deter third persons from associating or dealing with him or her.

313. All over the internet the posts about "GET refusers" state that the public should stop associating and dealing with said refusers.

314. The Defendants knew that by stating I was withholding a GET they would be causing people to stop associating with me.

315. Hundreds of posts and comments were made about me on Instagram because of the protests that occurred outside my home and my father's office.

316. It is important to note that not one Rabbinic Court permitted the Defendants to do any of the actions they did.

317. I am completely embarrassed and humiliated to go into any social events or Synagogues in the community where I live.

318. Everywhere I go I am recognized as a GET withholder.

319. A plethora amount of news media sites reported on the protests. Heshy Tischler, Amber Adler and Adina Miles gained nationwide attention for their involvement in protesting me and others.¹³

320. The Guardian and Vogue, both widely popular national news magazines, both published news articles on their sites reporting on my protest and others as well and this so called Agunah movement. What these media sites aren't aware of is that the people in charge of these campaigns are engaging in criminal acts of harassment and intimidation in order to violate the men's freedom of religion.

321. Several Jewish news media sites published the stories of the protests and in fact on one website there is a picture of me and my wife with a title that claims my wife was an Agunah. My wife is not an Agunah and said term causes me much permanent humiliation and causes me to lose good will in the eyes of the public.

¹³ See <https://www.theguardian.com/world/2021/jun/04/jewish-orthodox-women-divorce-get-refusal> and see <https://www.vogue.com/article/agunah-get-refusal-social-media-campaign-orthodox-women>.

322. I never requested to be published on any news media sites with a picture of me and my wife and the site stating that my wife was an Agunah.

323. I simply asked the people involved with doing the GET that a video be posted on Instagram advising the mob rioters not to come to my home because I gave my wife a GET.

324. Norma Tawil accused me of being a fake attorney. Said statement of fact was false and caused me much public humiliation and loss of good will as many people now think I was not a lawyer and was not allowed to practice law, when in fact, at the time of said statement I was authorized to practice law.

325. Nourite Maimon publicly stated a false statement of fact claiming that I am not a lawyer. When Nourite Maimon made this statement I was “temporarily authorized to engage in the practice of law” by order of the Supreme Court of New York Appellate Division 2nd Department.(see attached).

326. According to <https://en.wikipedia.org/wiki/Lawyer>, a lawyer is a person who practices law.

327. According to the order of the Supreme Court of New York Appellate Division 2nd Department I was authorized to engage in the practice of law, albeit temporarily.

328. Accordingly, Nourite Maimon is guilty of defamation per se by accusing me of falsely stating to people that I was a lawyer in addition to her false statement of fact claiming that I was not a lawyer.

329. Laurie Beda is guilty of helping my wife enrich herself with approximately \$128,000 by defaming me in a public forum in writing.

330. I am suffering damages of additional legal fees and time spent in divorce court because of Laurie Beda, which is taking away valuable time I need in order to study for the Bar exam and get a job.

331. All the Defendants accused me of abuse and not “Freeing” my wife Elizabeth. The Defendants accused me of the crimes of false imprisonment and kidnapping.

332. Non-Jews are not familiar with the GET laws and Orthodox Judaism.

333. A search of Elizabeth Kairey online will show my wife’s picture and the hashtag free Elizabeth.

334. Most people will not understand that they are referring to a Jewish divorce matter. And instead, will reasonably conclude that Elizabeth’s husband, me, has committed the crimes of false imprisonment and/or kidnapping.

335. I have never been convicted of any crime, let alone any crimes against my wife.

336. I also have never been arrested for, allegedly, committing any crimes.

337. The undersigned is quite confused why the FBI and US Department of Justice did not pursue the claim made by me that the Defendants violated 18 U.S. Code § 241 - Conspiracy against rights as from reading the statute it appears to me that the Defendants violated said statute.

338. If this Court has the power to direct the US Department of Justice to prosecute the Defendants for violation of said Federal statute I would ask that it do so if this Honorable Court believes it should be investigated.

THIRD CAUSE OF ACTION- 42 U.S. CODE § 1985

339. Plaintiff repeats, reiterates, and incorporates the allegations contained in paragraphs numbered “1” through “338” herein with the same force and effect as if the same were set forth at length herein.

340. The Defendants engaged in acts in furtherance of a conspiracy for the purpose of depriving me, either directly or indirectly, equal privileges and immunities under the laws of the United States.

341. I was deprived of my rights under the United States Constitution of Freedom of Religion.

342. I was specifically targeted to give my wife a GET, a Jewish divorce document.

343. Under no circumstance can the Defendants be allowed to harass me and bring a mob of rioters to my home, destroy my property, and not allow me to live in peace in my private residence. The Defendants incited illegal riots at my home and threatened to do so daily.

344. The Defendants conspired together at the protest on March 11, 2021, by Corporal Wiltshire Park.

345. The Defendants certainly violated the local noise ordinances in New Jersey and forced me to flee my home out of fear of being mobbed. I was also scared to sleep home for the next 3 weeks due to the trauma I suffered because of these Defendants.

346. The Defendants all classified me as a “get refuser” and a “get denier”. Said classification is religiously based and the Defendants have an invidiously discriminatory animus towards what they deem are GET refusers. In reality, I am not a GET refuser. But they deemed me one.

347. The Defendants single out orthodox Jewish men who have not given their wife a GET and then based upon their own determinations decide who to harass and threaten.

348. The Defendants singled me out and targeted me with threats and oppression until I gave my wife a GET and I was completely coerced to do so.

349. Under no circumstance would I have given my wife a GET if not for the actions of the Defendants.

FOURTH CAUSE OF ACTION-INVASION OF PRIVACY

350. Plaintiff repeats, reiterates, and incorporates the allegations contained in paragraphs numbered “1” through “349” herein with the same force and effect as if the same were set forth at length herein.

351. The Defendants publicly disclosed private facts about me and placed me in a false light in the public eye.

352. The Defendants publicly called attention the private Jewish divorce matter between my wife and I with the intent to cause me intense ridicule and public shame.

353. Whether or not a Get is given by a husband to a wife is not a public record like a divorce action.

354. All the Defendants publicly stated that I was not giving my wife a Get and that I was a Get refuser.

355. Due to the numerous amounts of news media sites online classifying a Get refuser as a person who commits, *inter alia*, abusive behavior, the Defendants placed me in a false light in front of the public.

356. I am not a Get refuser.

357. According to Orthodox Jewish law, I was not obligated to give a GET and therefore cannot be classified as one who is GET refuser.

358. Even the organization ORA would agree that I was not a GET withholder as they define it, since no Bes Din issued a Siruv against me.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Pro Se Elliot M. Hirsch requests that the Court enter an Order, adjudge, and decree in favor of Plaintiff for:

A. An award of Compensatory and Punitive damages to the Plaintiff in an amount to be determined at trial but not less than \$50,000,000 with the Court adjudicating the amount to be attributed to each Defendant;

B. An injunction enjoining the Defendants from speaking about the Plaintiff in any public forum including but not limited to all forms of social media;

C. A permanent civil restraining order preventing the Defendants from contacting me in any form whatsoever, including a no-third party contact provision;

D. An award of treble as well as punitive damages due to Defendants' actions as willful, wanton, and malicious in any amount to be determined at trial;

E. An award of such other and further relief as the Court may deem just and proper.

VIII. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11. I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case. Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

Dated: August 20, 2021

A handwritten signature in black ink, appearing to read "E. Hirsch", written over a horizontal line.

Elliot M. Hirsch

917 750 0418

Address: 7 Saxony Drive, Oakhurst, NJ 07755,

County of Monmouth

EXHIBIT A

COMPLAINT - SUMMONS

COMPLAINT NUMBER				THE STATE OF NEW JERSEY VS. LAURIE BEDA 1047 STRATTON PLACE LONG BRANCH NJ 07744-0000	
1337	S	2021	000195		
<small>COURT CODE</small>	<small>PREFIX</small>	<small>YEAR</small>	<small>SEQUENCE NO.</small>		
OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000 732-531-5005 COUNTY OF: MONMOUTH					
# of CHARGES 3	CO-DEFTS	POLICE CASE #:		DEFENDANT INFORMATION SEX: EYE COLOR: DOB: DL STATE: DRIVER'S LIC. #: SBI #: SOCIAL SECURITY #: TELEPHONE #: 718-314-7963 (C) LIVESCAN PCN #:	
COMPLAINANT NAME: ELLIOT HIRSCH 7 SAXONY DRIVE OAKHURST NJ 07755					
By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 03/10/2021 in OCEAN TWP , MONMOUTH County, NJ did:					
WITHIN THE JURISDICTION OF THIS COURT, LAURIE BEDA ADVISED A MOB OF 700 TO LET ME KNOW I WILL BE GETTING A "BEATING" AT MY HOME 7 SAXONY DRIVE. SHE ALSO STATED PUBLICALLY ON VIDEO THAT "IF I DO NOT GIVE A "GET" TODAY MARCH 11, 2021, THE PROTESTORS WILL BE AT MY HOME TOMORROW. THE MOB PROTESTORS ARE CONFIRMED TO HAVE DAMAGED THE NIGHT BEFORE THE PROPERTY OF ANOTHER INDIVIDUAL THE NIGHT BEFORE BY THROWING EGGS AT THE HOME. I HAVE EVIDENCE OF ALL THIS. LAURIE BEDA THREATEN MY PROPERTY AND ME THAT IF I DONT GIVE HER NIECE THE "GET." ON MARCH 10, 10 OCEAN TOWNSHIP POLICE OFFICERS WERE NEEDED TO DISPERSE THE ILLEGAL PROTEST IN VIOLATION OF STATUTE N.J.S.A 2C:33-4A.					
WITHIN THE JURISDICTION OF THIS COURT, LAURIE BEDA ADVISED A MOB OF 700 PEOPLE TO LET ME KNOW I WILL BE GETTING A "BEATING" AT MY HOME 7 SAXONY DRIVE UNLESS I GIVE MY WIFE A "GET". SHE ALSO STATED PUBLICALLY ON VIDEO THAT "IF I DONT GIVE A					
in violation of:					
Original Charge	1) 2C:33-4C		2) 2C:33-4A		3) 2C:33-2A(1)
Amended Charge					
CERTIFICATION I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment. Signed: <u>X</u> <u>CAF</u> Date: <u>X</u> <u>5/11/21</u>					
PROBABLE CAUSE DETERMINATION AND ISSUANCE OF SUMMONS					
<input type="checkbox"/> Probable cause IS NOT found for the issuance of this complaint:					
Signature of Court Administrator or Deputy Court Administrator		Date		Signature of Judge	
<input checked="" type="checkbox"/> Probable cause IS found for the issuance of this complaint-summons:					
				Signature of Judge	
SUMMONS					
YOU ARE HEREBY SUMMONED to appear before the Municipal Court in the county of: MONMOUTH					
at the following address: OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000					
If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.					
Date of Arrest:		Appearance Date: 06/22/2021		Time: 10:15AM Phone: 732-531-5005	
Signature of Person Issuing Summons:		TIMOTHY MCGOUGHAN JUDICIAL OFFICER		Date: 05/11/2021	
<input type="checkbox"/> Domestic Violence – Confidential		<input type="checkbox"/> Related Traffic Tickets or Other Complaints		<input type="checkbox"/> Serious Personal Injury/ Death Involved	
Special conditions of release: <input type="checkbox"/> No phone, mail or other personal contact w/victim <input type="checkbox"/> No possession firearms/weapons <input type="checkbox"/> Other (specify):				ORIGINAL	
				Page 1 of 11 NJ/CDR1 1/1/2017	

COMPLAINT - SUMMONS

COMPLAINT NUMBER				STATE V.	LAURIE BEDA
1337	S	2021	000195		
<small>COURT CODE</small>	<small>PREFIX</small>	<small>YEAR</small>	<small>SEQUENCE NO.</small>		
<p>"GET" TODAY MARCH 11, 2021, THE PROTESTORS WILL BE AT MY HOME TOMORROW. THE MOB PROTESTORS ARE CONFIMED TO HAVE DAMAGED THE NIGHT BEFORE THE PROPERTY OF ANOTHER INDIVIDUAL THE NIGHT BEFORE BY THROWING EGGS AT THE HOME. I HAVE EVIDENCE FOR ALL THIS. LAURIE BEDA THREATEN MY PROPERTY AND ME THAT IF I DONT GIVE HER NEICE THE "GET." ON MARCH 10, 10 OCEAN TOWNSHIP POLICE OFFICERS WERE NEEDED TO DISPERSE THE ILLEGAL PROTEST IN VIOLATION OF STATUTE N.J.S.A 2C:33-4A.</p> <p>WITHIN THE JURISDICTION OF THIS COURT, LAURIE BEDA PUBLICALLY ON INSTRAGRAM WITH 700 VIEWERS CREATED DANGEROUS CONDITION AND PURPOSE TO CAUSE PUBLIC ANNOYANCE AND INCONVENIENCE BY ADVISING 700 PLUS PEOPLE TO COME TO MY HOME TO RIOT AND PROTEST. SHE ALSO STATED IN A PUBLIC PLACE VERBALLY SHE WILL BRING A MOB OF ILLEGAL PROTESTORS WHO HONK AND BLOCK STREETS TO PUBLIC WALKWAYS TO MY HOME AT 7 SAXONY DRIVE. I HAVE VIDEO EVIDENCE FOR EVERY SINGLE ALLEGATION MADE. 10 OCEAN TOWNSHIP POLICE OFFICERS RESPOND ON MARCH 10, 2021 TO MY RESIDENCE AND DISPERSE THE ILLEGAL PROTEST AT MY RESIDENCE. OFFICERS HEARD MY NAME BEING YELLED AND PEOPLE DEMANDING THE "GET." OFFICERS CONFIRMED THAT THE PROTESTORS BLOCKED THE STREET AND WERE CAUSING A DISTURBANCE IN VIOLATION OF STATUTE N.J.S.A 2C:33-2A(1).</p>					
Original Charge					
Amended Charge					
				COMPLAINT - SUMMONS	
				Page 2 of 11 NJ/CDR1 1/1/2017	



Township of Ocean Police NJ0133700

399 Monmouth Road OAKHURST, NJ 07755 (732)531-1800
Officer Report for Incident 21OT04466

Nature: DOMESTIC
Location: P373

Address: 7 SAXONY DR
OCEAN TWP NJ 07712

Offense Codes: HARR
Received By: Kanarkowski, E **How Received:** T **Agency:** P37
Responding Officers: Redmond II, K, Bernhard, Bre, Bones, J, Abbott, M, Larkins, J, Kane, K, Orbach, J, Martone, G, Legg, M, Stenger, C
Responsible Officer: Bones, J **Disposition:** CLO 03/11/21
When Reported: 22:07:18 03/10/21 **Occurred Between:** 22:03:35 03/10/21 and 22:03:35 03/10/21

Assigned To:
Status:

Detail:
Status Date: **/**/**

Date Assigned: **/**/**
Due Date: **/**/**

Complainant:

Last:
DOB: **/**/**
Race:

First:
Dr Lic:
Phone:

Mid:
Address:
City:

Offense Codes

Reported:
Additional Offense: HARR Harassment

Observed:

Circumstances

Responding Officers:

Redmond II, K
Bernhard, Bre
Bones, J
Abbott, M
Larkins, J
Kane, K
Orbach, J
Martone, G
Legg, M
Stenger, C

Unit :

P37261
P37289
P37296
P37302
P37291
P37285
P37275
P37268
P37254
P37288

Responsible Officer: Bones, J

Agency: P37

Status: CMPLT (Nelson, K) on 14:29:01 03/29/21
Partition: "p37lk

Date Printed: 05/05/21

Officer Report for Incident 21OT04466

Page 2 of 7

Received By: Kanarkowski, E
How Received: T Telephone
When Reported: 22:07:18 03/10/21
Judicial Status:
Misc Entry:

Last Radio Log: 03:49:23 03/11/21 C
Clearance: RR Report Required
Disposition: CLO **Date:** 03/11/21
Occurred between: 22:03:35 03/10/21
and: 22:03:35 03/10/21

Statute:	Description :	Method :
----------	---------------	----------

Involvements

Date	Type	Description	
03/10/21	Name	HIRSCH, ELLIOT M	Victim
03/10/21	Cad Call	22:07:18 03/10/21 DOMESTIC	Initiating Call

Status: CMPLT (Nelson, K) on 14:29:01 03/29/21
 Partition: "p37lk"

Date Printed: 05/05/21

Officer Report for Incident 21OT04466

Page 3 of 7

Narrative

Narrative By: Ptl. Bones #296 BWC: 19 Date: 3/10/21

Assisting Patrolman: Ptl. Larkins #291 BWC: 24
 Ptl. Jones #302 BWC: 21
 Ptl. Bernhard #289 BWC: 16
 Ptl. Stenger #288 BWC: 20
 Ptl. Redmond #261 BWC: 10
 Ptl. Kane #285 BWC: 15
 Ptl. DeSimone #227 BWC: 18
 Sgt. Martone #268 BWC: 23
 Sgt. Orbach #275 BWC: 36

Crime: 2C:33-4 / Harassment

MO: Offender harassed the victim by allegedly inciting a protest at his residence in Ocean Twp NJ.

On 3/10/21 at approximately 2207 hours, Ptl. Larkins #291, Ptl. Jones #302, Ptl. Bernhard #289, Ptl. Stenger #288, Ptl. Redmond #261, Ptl. Kane #285, Ptl. DeSimone #227, Sgt. Martone #268, Sgt. Orbach #275 and I responded to the area of 7 Saxony Drive for a report of a large crowd outside of the residence. Upon arrival we observed numerous vehicles parked in the roadway, obstructing the flow of traffic as well as pedestrians standing on the sidewalks. While attempting to gather information, people began to loudly chant "give her a GET". A GET is paperwork in the Jewish Community which allows a divorce to be finalized. While chanting, vehicles began to beep their horns, waking residents and causing complaints for noise. Patrols were able to disburse the crowd as well as issue motor vehicle summonses for (39:3-69 / Improper Use of Horn). All protesters were advised to disperse and leave the area, due to the obstruction of the roadway and noise complaints. All protesters were advised to contact the Township of Ocean to obtain a permit to assemble and protest legally. After the protesters were dispersed, Ptl. Redmond #261 and I performed a building check of the residence and confirmed that all doors were locked and there was no damage to the property.

I responded to headquarters to speak with the complainant, Elliot Hirsch. Elliot informed me that he and his ex-wife Elizabeth Kairey are currently in the process of divorce. Elliot believes that Elizabeth incited this protest but was not able to provide me physical evidence. Elliot stated that Elizabeth met with him on either February 23 or 24 at a bagel shop in Brooklyn NY. During this conversation, they discussed their divorce. While conversing, Elliot alleged that Elizabeth stated she would send people after him if she did not receive a GET. Elliot believes this protest is a result of their February 23rd or 24th conversation. Elliot advised he wished to apply for a Temporary Restraining Order due to Harassment. Elliot informed me that he has not resided with Elizabeth for approximately 4 years but to his knowledge she does not currently own any weapons or have a Firearms Identification Card. Elizabeth was checked for firearms via NCIC with negative results.

I contacted Elizabeth via telephone to confirm that she was ok, due to the protesters chanting her name and well as Elliot's. Elizabeth informed me that she was ok. Elizabeth stated she was unaware of the protest and further advised me that she did not ask people to gather or post Elliot's personal address on the internet. Elizabeth stated that they have been in the divorce process for awhile and have had similar issues in the past. I asked Elizabeth about their child and she informed me that she was ok and would not provide me with any

Status: CMPLT (Nelson, K) on 14:29:01 03/29/21
 Partition: "p37lk"

Date Printed: 05/05/21

Officer Report for Incident 21OT04466

Page 4 of 1

further information for this incident.

Elliot was advised of his Rights under the NJ Domestic Violence Act. Elliot indicated that he understood and wished to apply for a Temporary Restraining Order. He signed the form indicating same. Elliot spoke with Judge McGoughran via telephone and a TRO was granted. I advised Elliot that he was eligible to speak with a Domestic Violence Response Team Member which he declined at this time. Elliot was provided a copy of the TRO. Elliot was advised of the complaint signing process for NJ and NY.

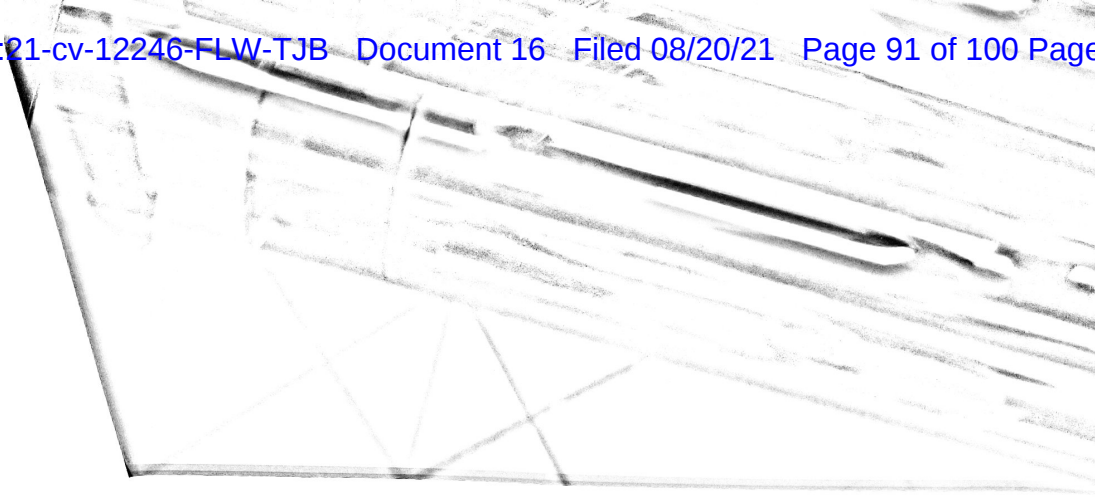
I completed a Victim Notification Form, CADAR Form, NJ Domestic Violence Supplementary Form and a Handle With Care Form. All forms are included in the case file. The Handle With Care Form was e-mailed to LEAH@OROTSARAH.COM.

All Digital evidence was tagged and downloaded to the case.

No further action taken.

Status: CMPLT (Nelson, K) on 14:29:01 03/29/21
Partition: "p37lk"

Date Printed: 05/01/21



Officer Report for Incident 21OT04466

Page 7 of 7

Name Involvements:

Victim : 656190

Last: HIRSCH

DOB: 08/01/87

First: ELLIOT

Dr Lic: H461621474088
72

Mid: M

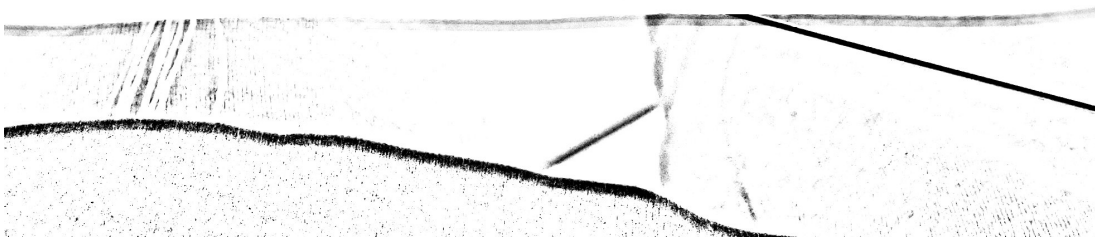
Address: 7 SAXONY DR

Race: W

Sex: M

Phone: (917)750-0418

City: OAKHURST, NJ 07755-1623



**SUPREME COURT OF THE STATE OF NEW YORK
APPELLATE DIVISION: SECOND JUDICIAL DEPARTMENT**

ALAN D. SCHEINKMAN, P.J.
WILLIAM F. MASTRO,
REINALDO E. RIVERA,
MARK C. DILLON,
RUTH C. BALKIN, JJ.

In the Matter of the Application of

ELLIOT M. HIRSCH

TEMPORARY PRACTICE
AUTHORIZATION ORDER

for Authorization to Engage in the
Limited Practice of Law

Upon the application of Elliot M. Hirsch, dated September 22, 2020, and supplemental submissions dated September 24, 2020 and September 29, 2020, for an order authorizing the applicant to engage in the limited practice of law under the terms of the Temporary Authorization Program (the “Program”), it is

ORDERED that the applicant is temporarily authorized to engage in the practice of law, subject to the conditions and limitations set forth below:

1. The applicant shall work in the State of New York under the supervision of attorneys employed by the applicant’s employer. All supervising attorneys must be attorneys who are, and have been for at least three years, duly admitted to practice in the State of New York and members in good standing of the bar of the State of New York.

2. The applicant may perform, subject to the provisions and limitations of this Order, the functions of an attorney and counselor-at-law.

3. A supervising attorney shall be actually present to supplement or correct any written or oral statement, or any action of the applicant in all (1) examinations before trial and (2) cases in which the applicant appears before a court, except for routine calendar calls. If a supervising attorney is not available and present, the matter may not proceed. For routine calendar calls, a supervising attorney shall be immediately available to appear should the need arise. In all circumstances, the applicant’s appearance shall be on notice to the jurist before whom the appearance is made.

4. A supervising attorney must approve the final versions of all legal documents drafted by the applicant, and the supervising attorney’s name must appear thereon. Whenever a signature is required by

Part 130 of the Rules of the Chief Administrator of the Courts (22 NYCRR part 130), the paper shall be signed by a qualified supervisor.

5. The applicant may not open or maintain any attorney escrow account and may not be a signatory on any attorney escrow account.

6. The applicant may not finally dispose of any matter without the prior approval of a supervising attorney.

7. The applicant, in accordance with the limitations and conditions expressed in this order, is approved to appear before all courts of record in this State, except for the Court of Appeals and the Appellate Division, where appearances are permitted only with the prior approval of those Courts.

8. The applicant shall immediately notify this Court and any other appropriate Department of the Appellate Division if he or she is no longer eligible to participate in the Program.

And it is further

ORDERED that this order shall immediately expire if the applicant (1) does not sit for the Uniform Bar Examination (the "Exam") by August 2021; (2) fails the Exam or any other bar examination administered in New York or any other state or territory of the United States, or in the District of Columbia; (3) fails to submit a completed Application for Admission to the appropriate Department of the Appellate Division within four weeks of the publication of Exam results or promptly respond to any request for additional application materials; (4) is not admitted to the bar of the State of New York for reasons related to character or fitness to practice; or (5) ceases to be employed by the applicant's current employer; and it is further

ORDERED that otherwise, this order shall immediately expire upon the applicant's admission to the bar of the State of New York.

SCHEINKMAN, P.J., MASTRO, RIVERA, DILLON and BALKIN, JJ., concur.

ENTER:

A handwritten signature in black ink, appearing to read 'A D R', is written over a horizontal line.

ALAN D. SCHEINKMAN
Presiding Justice

Dated: October 8, 2020



אור הלכה
OHR HALACHA
למנוח ולמנוחית לשמור ולשנות

בית דין שע"י אור הלכה

רב חיים אשר ארקינג, הרב פנחס רבינוביץ, רב אליעזר כהן

בס"ד

Re: Elliot Hirsch vs. Elizabeth (Kairey) Hirsch

7 Nissan 5779

A status letter from our Bet Din was sent out in the summer of 2018 regarding this case. There was credible fear of non-compliance by Elliot to the decision of the Bet Din. However it has been verified that many times and even currently we have seen actions by Elizabeth contradicting the directives of Bet Din and we have given her much time to rectify her and her previous lawyer's missteps.

As of the most recent hearing in court April 10, 2019 she had sought to confirm the decision, however she and her lawyers still have not followed the decision of the Bet Din. Therefore we have to declare that although the actions and position of Elliot have not been compliant with the fair ruling of the Bet Din, Elizabeth has not either been compliant in many ways. For example, throughout the length of the case she had refused Elliot and his parents' visitation against the directive of the Bet Din; her motion in court overreached to vacate the decision of Bet Din; and of most current she is demanding supervised visitation against the decision of the Bet Din.

Therefore, the previous status letters should not be effective until further notice.

Therefore we would like to clarify and give a directive:

- a) The temporary award in the addendum of \$17,185 shall be permanently deducted from the decision for Elliot's legal fees.
- b) Husband is not obligated in any back pay of the May 2017 decision and only starting from May 2019.

רב אליעזר כהן ס"ט

Rabbi Eliezer Cohen

רב חיים אשר ארקינג הכהן

Rabbi Hayim A. Arking

הרב פינחס אליהו רבינוביץ

Rabbi Pinchus Rabinowitz

בית דין צדק דאמעריקא-עין משה
Beth Din Zedek of America-Ein Moshe

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Halachic Guidance

מיוסד וע"ש
הגאון מהר"ם הלוי שטיינבערג זצ"ל
אב"ד בראדי

RABBI SOLOMON B. HERBST

Rosh Beth Din

B"H

Fax transmittal cover sheet

Date: MAY 10th, 2018

To: ELLIOT M. HIRSCH

From: RABBI SOLOMON B. HERBST Fax #: 212-385-0007

Total number of pages including cover sheet 2

Please call immediately if you did not receive all pages: 212 385-0006

Thank You !

fax

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הגאון מהר"ם הלוי שטיינבערג זצ"ל

אב"ד בראדי

RABBI SOLOMON B. HERBST

Rosh Beth Din

B.H.

May 10th, 2018

To Whom It May Concern:

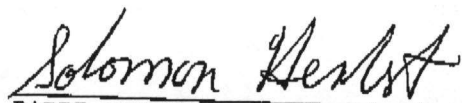
In the summer of August 2017 Elliot M. Hirsch came to me for help in regard to visitation with his daughter.

I spoke with his father-in law Ikey Kairey and Elizabeth Kairey. They refused to come to my Beth Din and I gave Elliot M. Hirsch a heter to go to Civil Court to see his daughter because Elizabeth Kairey refused to give him visitation.

Elliot did not see his daughter until December 2017 when Elizabeth finally agreed to come to a different Beth Din Btzedek Tishpot.

Elliot spent money in legal fees because Elizabeth sued him for divorce in New York without permission of any Beth Din.

Elliot Hirsch should receive reimbursement for all legal fees that he incurred by Elizabeth Kairey.



RABBI SOLOMON B. HERBST, ROSH BETH DIN

Badatz Btzedek Tishpoit
239 Foster Avenue
Brooklyn, NY 11230-2195



In the matter of Elliot Hirsch, Plaintiff vs Elizabeth Kairey, Defendant

Being that our Beis Din has sent out Hazmanas to the Defendant of this case and whereas we have been involved in convincing the Plaintiff to accept the Beis Din previously arbitrating the case, we therefore feel compelled to release our view of this case that is stretching needlessly for over a year.

- 1) The above Plaintiff, after being denied visitation, was permitted by the Av Beis Din of a prominent Beis Din in Brooklyn, New York, to submit to secular court in order to get to visit with his daughter.
 - 2) Finally, after three Hazmanas, warnings and the issuance of a Siruv, the Defendant agreed to go to a Beis Din in New Jersey created by a Rabbi that chose two more arbitrators to make a panel of three.
 - 3) Alas, after receiving a ruling from that Beis Din, the Defendant did not comply with such ruling regarding visitation and suddenly became extremely 'afraid' of the Plaintiff, enough so, to apply for an Order of Protection against the Plaintiff entering complaints against him and to try to have the Plaintiff arrested.
 - 4) Thereafter, the Defendant moved in court to vacate the ruling of Beis Din.
 - 5) It is of our opinion that after such disregard of the Psak Beis Din the Defendant has possibly entered into the category of one who after going to court loses their right to return to Beis Din for further adjudication (See CH"M 26:1).
 - 6) The Beis Din that has presided over this case failed to condemn the Defendants actions when it was notified of the move to vacate their decision. It is hard to believe that they can judge the Plaintiff fairly any longer according to Halacha.
 - 7) See Ch"M 388:5 Sha"ch 26 that one who goes to court without permission of Beis Din must pay the other side's legal fees. This seems to be the case in the matter at hand. This has also been previously confirmed by the abovementioned Av Beis Din.
 - 8) Nevertheless, the opinion of our Beis Din remains that the Defendant has the right to receive her Gett from the Plaintiff once all the issues between them have been settled. This includes visitation, child support, legal and physical custody, Ketuba, division of marital assets, legal divorce and any other outstanding issues. The faster these issues are settled the faster the parties will be able to move on with their lives separate from each other.
- To this letter I affix my signature in the name of the Beis Din on January 6, 2019 corresponding to 29 Teves 5779.

Avrohom Kirsch

Rabbi Avrohom Kirsch, Dayan in the name of the Beis Din



Email Address: btzedektishpoit@gmail.com

Tel: 718-854-1512 Fax: 718-298-3166 Cell: 347-263-9696

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אב"ד בראדי
RABBI SOLOMON B. HERBST
Rosh Beth Din

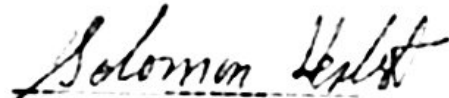
B.H.

August 28th, 2018

To Whom It May Concern:

Please be advised that I have read the letter that Rabbi Avrohom Kirsch Dayan of the Badatz Beth Din wrote and signed.

I agree with every point that he wrote and therefor Mr. Elliot Hirsch cannot be pressured to give a GET.



Rabbi Solomon B. Herbst

בס"ד

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אב"ד בראדי
RABBI SOLOMON B. HERBST
Rosh Beth Din

To whom it may concern:

Please be advised that I have read the letter Rabbi Avrohom Kirsch Dayan of Badatz Beth Din wrote and signed on January 6, 2019. I confirm that I gave Mr. Elliot Hirsch permission to go to court last year in order to get visitation rights with his daughter. I also confirm Mr. Hirsch should receive reimbursement for his legal fees since his wife did not obtain permission from a Beth Din to go to court. I further confirm that I agree with section #7 and #8 from Rabbi Kirsch's letter and therefore Mr. Elliot Hirsch cannot be pressured to give his wife a GET.

JAN 8 '19 אס"ס

Rabbi Solomon B. Herbst

Badatz Btzedek Tishpoit
239 Foster Avenue
Brooklyn, NY 11230-2195



August 5, 2019

In the matter of Hirsch v Kairey

We the undersigned have been involved in the above matter from the early stages of the case. We originally pressured the parties to remove the matter from court and litigate all claims in Beis Din. It is of our opinion that this matter could have been resolved many times already. However, even after the issues were dealt with in another Beis Din that was involved, the wife continues to submit new claims to secular court. Unfortunately, this action has caused many delays in the settling of this matter. The Beis Din involved stands by idly without condemning the wife's behavior.

Now therefore, anyone who aids the wife in her offensive in secular court in any way, is considered a *מסייע לדבר עבירה* and is causing this case to drag on indefinitely.

It is our hope that the parties will come up with a mutually accepted agreement and they will each go their separate ways and continue on to build Jewish homes where their child will grow up in peace and tranquility.

May we all merit the final redemption and the rebuilding of the Beis Hamikdash speedily in our days.

To this we affix our signatures on the fourth day of the month of Menachem- Av in the year 5779.

Avrohom Kirsch

Rabbi Avrohom Kirsch, Dayan in the name of the Beis Din



Email Address: btzedektishpoit@gmail.com
Tel: 718-854-1512 Fax: 718-298-3166 Cell: 347-263-9696